

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

Planning Division

Draft Mitigated Negative Declaration

WARD: 1

1. Case Numbers: P17-0506 (Design Review), P17-0507 (Grading Exception), P17-0747 (Summary Vacation), P17-

0748 (Grading Exception) & P17-0749 (Variance)

2. Project Title: 750 Marlborough Avenue Warehouse

3. Meeting Date: March 7, 2018

4. Lead Agency: City of Riverside

Community & Economic Development Department

Planning Division

3900 Main Street, 3rd Floor Riverside, CA 92522

5. Contact Person: Candice Assadzadeh, Associate Planner, (951) 826-5667

6. **Project Location:** 750 Marlborough Avenue and 1550 Research Park Drive, situated at the eastern terminus of

Marlborough Avenue and the southwestern terminus of Research Park Drive. APNs: 257-060-002

and 257-030-042 (Figure 1).

7. Project Applicant/Project Sponsor's Name and Address: Guthrie Pericles, LLC

Attn: Douglas Thompson and Jim Guthrie 1451 Research Park Drive, Suite 200 Riverside, California 92507-2154

8. General Plan Designation: Business/Office Park (B/OP)

9. Zoning Designation: BMP-SP – Business and Manufacturing Park and Specific Plan (Hunter Business Park)

Overlay Zones

10. Description of Project: The proposed project involves construction of a 346,330 square foot industrial building comprised of approximately 339,510 square feet of unrefrigerated warehouse space and 6,820 square feet of office space, on an approximately 22.34 gross-acre site (APNs 257-060-002 and 257-030-042). The gross-acreage includes the addition of approximately 0.3 acres from the property to the north (APN 257-030-016) as a result of a lot line adjustment, to be recorded prior to the issuance of grading permits. Additionally, the existing Marlborough Avenue right-of-way currently continues across the Gage Canal and transitions to a partially dedicated cul-de-sac on the project property. The proposed project would revise the existing right-way to have an off-set cul-de-sac across the Gage Canal, partially within the subject property, partially within an offsite parcel, and would vacate the existing partially dedicated cul-de-sac right-of-way within the project property. A legal description and plat map have been prepared for this summary vacation in conjunction with the proposed project.

The Hunter Business Park Specific Plan limits lot coverage to 50 percent and the BMP zoning district allows for a maximum floor area ratio (FAR) of 1.5. The project would result in building site coverage of 35.3 percent and a FAR of 0.5. The project would include 375 standard vehicular parking spaces, four ADA parking spaces, and 12 trailer parking spaces. Primary vehicular access to the project site would be provided by a driveway entrance located at the eastern terminus of Marlborough Avenue, on the western border of the site. A secondary driveway entrance would be located at

the northern border of the site at the southern terminus of Research Park Drive. The main freight truck entrance/exit to the proposed warehouse would be from Marlborough Avenue; the main passenger vehicle entrance would be from Research Park Drive. It is assumed the building would operate 24 hours a day, Monday through Sunday, with the exception of some holidays.

The project also includes the enhancement and partial reconstruction of an existing 10-foot-wide multi-purpose trail, consisting of decomposed granite material. It extends from the southwest corner of the site to the south and east sides of the site. The trail is proposed to be graded to drain into a proposed ditch/channel that will run along the southern and eastern side of the trail for storm water protection. The trail has been redesigned to provide a 12-foot wide clearance for fire service vehicles with a maximum slope no greater than 15 percent where feasible, as it is also used as a Fire access road. Lastly, the trail will be used as a maintenance road for maintenance of the proposed graded slopes and the storm water protection system, which consists of the drainage ditch/channel adjacent to the trail and the proposed underground storm drain.

11. Surrounding land uses and setting: The project site is located in Hunter Business Park within the City of Riverside, west of the terminus of Marlborough Avenue and south of the terminus of Research Park Drive, at the foot of the western portion of the Box Springs Mountains. The proposed project site currently consists of previously disked lots with sparsely vegetated areas on the south and east margins at the toe of the Box Springs Mountains. A cement-lined culvert traverses directly east-west through the site. Stormwater flows are contained on the project site under current conditions. There are no regular water sources, suitable riparian vegetation or soils, or riverine features that support downstream resources. Land uses immediately adjacent to the property are described in Table 1 below and include industrial development to the north and west, and open space to the east and south.

Table 1 Surrounding Land Uses and General Plan/Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Vacant	B/OP - Business Office/Park	BMP-SP – Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
North	Office, Light Industrial	B/OP - Business Office/Park	BMP-SP – Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
West	Office, Light Industrial	B/OP - Business Office/Park	BMP-SP – Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
South	Box Springs Mountain Reserve Park	OS-C – Open Space – Conservation (Riverside County jurisdiction)	R-1 – One Family Dwellings (Riverside County jurisdiction)
East	Box Springs Mountain Reserve Park	OS-C – Open Space – Conservation (Riverside County jurisdiction)	R-1 – One Family Dwellings (Riverside County jurisdiction)

12. Other public agencies whose approval is required (e.g. permits, financial approval, or participation agreement.):

a. None

13. Other Environmental Reviews Incorporated by Reference in this Review:

- a. 750 Marlborough Drive Project Cultural Resources Study, prepared by Rincon Consultants, Inc., dated November 2017
- b. 750 Marlborough Drive Project MSHCP Consistency Analysis and Habitat Assessment, prepared by Rincon Consultants, Inc., dated December 2017
- c. Air Quality and Greenhouse Gas Study 750 Marlborough Drive Warehouse Project, prepared by Rincon Consultants, Inc., dated December 2017
- d. General Plan 2025
- e. GP 2025 FPEIR
- f. Hunter Business Park Specific Plan
- g. Hydrologic Analysis for Marlborough Industrial in the City of Riverside, CA
- h. Marlborough Industrial Project Traffic Impact Analysis, prepared by Rick Engineering, dated December 2017

- Noise Study 750 Marlborough Drive Warehouse Project, prepared by Rincon Consultants, Inc., dated December 2017
- j. Preliminary Project Specific Water Quality Management Plan for Guthrie Industrial

14. Acronyms

AQMP Air Quality Management Plan
CEQA California Environmental Quality Act
EIR Environmental Impact Report

FEMA Federal Emergency Management Agency
FPEIR Final Program Environmental Impact Report

GIS Geographic Information System

GHG Greenhouse Gas GP 2025 General Plan 2025 IS Initial Study

MND Mitigated Negative Declaration

MSHCP Multiple Species Habitat Conservation Plan

PW Public Works, Riverside

RCALUCP Riverside County Airport Land Use Compatibility Plan

RFD Riverside Fire Department
RMC Riverside Municipal Code
RPD Riverside Police Department
RPU Riverside Public Utilities

RTP/SCS Regional Transportation Plan/Sustainable Community Strategy

RUSD Riverside Unified School District

SCAG Southern California Association of Governments
SCAQMD South Coast Air Quality Management District
SKR-HCP Stephens' Kangaroo Rat - Habitat Conservation Plan

SWPPP Storm Water Pollution Prevention Plan

Figure 1 Project Location



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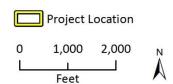
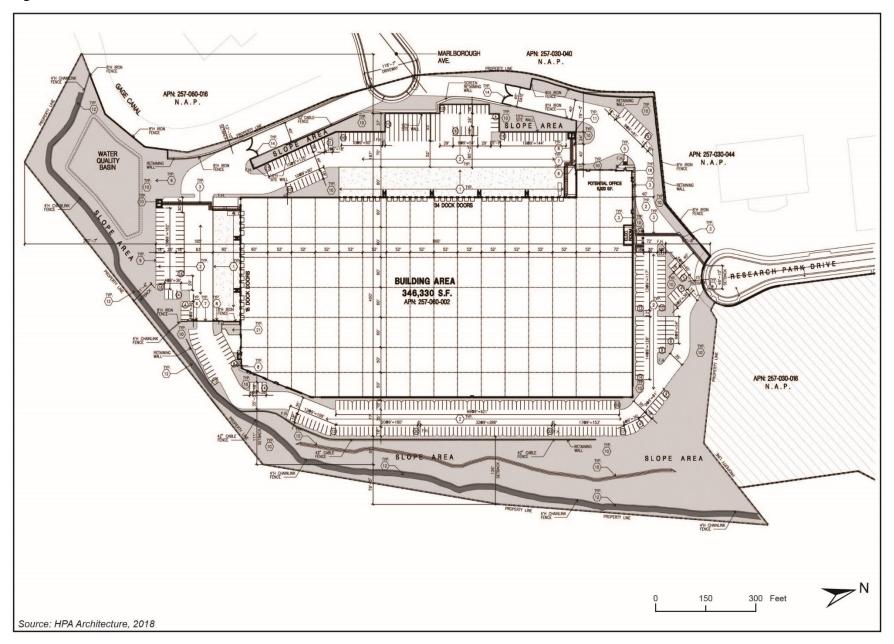




Figure 2 Project Site



Figure 3 Site Plan



ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. Aesthetics Agriculture & Forest Resources Air Quality Biological Resources Cultural Resources Geology/Soils Greenhouse Gas Emissions Hazards & Hazardous Materials Hydrology/Water Quality Land Use/Planning Mineral Resources Population/Housing Public Service Recreation Tribal Cultural Resources Utilities/Service Systems Transportation/Traffic Mandatory Findings of Significance **DETERMINATION:** (To be completed by the Lead Agency) On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that: The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. The City of Riverside finds that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. Signature Printed Name & Title _____ For City of Riverside



COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

City of Arts & Innovation

Planning Division

Draft Mitigated Negative Declaration

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
- 4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS				
Would the project:				
a. Have a substantial adverse effect on a scenic vista?			\boxtimes	

1a. Response (Source: GP 2025 Figure CCM-4 Master Plan of Roadways, GP 2025 Open Space and Conservation Element, GP 2025 FPEIR Figure 5.1-1 Scenic and Special Boulevards and Parkways, Table 5.1-A Scenic and Special Boulevards, and Table 5.1-B Scenic Parkways)

Less Than Significant Impact. The proposed warehouse consists of an infill project in a developed area, surrounded by existing office and light industrial development. General Plan 2025 (GP 2025) Figure CCM-4 labels Marlborough Avenue as a special boulevard between Chicago Avenue and Rustin Avenue, approximately 0.3 miles west of the project site. There are no view restrictions or regulations associated with the special boulevard designation. However, according to the GP 2025 Open Space and Conservation Element, the ridgelines of Box Springs Mountain Reserve Park, directly east and south of the project site, are scenic view points from the City.

The proposed building is anticipated to be a maximum of 45 feet in height, which is comparable to existing buildings in the project site vicinity. Marlborough Avenue has a slight eastward incline, starting at approximately 990 feet above mean sea level (msl) at the intersection with Northgate Street, to approximately 1,030 feet above msl at the proposed Marlborough Avenue entrance to the project site. The project site is located at the foothill of Box Springs Mountain Reserve Park, which incurs a steep elevation climb from approximately 1,120 feet at its base (eastern boundary of the project site), to approximately 1,400 feet at the ridgeline peak nearest to the project site (Figure 4).

Figure 4 Elevation Profile from Marlborough Avenue and Northgate Street to Box Springs Mountain Reserve Park



Source: GoogleEarth 2017

Therefore, the new building would not detract from views of Box Springs Mountain Reserve from Marlborough Avenue. Portions of Mount Rubidoux, approximately four miles southwest, and the San Gabriel and San Bernardino Mountains, approximately 23 miles northeast, are partially visible from the project site. However, Box Springs Mountain Reserve Park as well as existing surrounding buildings and natural elevation changes, obstruct much of these views. Therefore, the project would have **less than significant impacts** on scenic vistas. No mitigation is required.

state scenic highway?	ntially damage scenic resources, including, but not , trees, rock outcroppings, and historic buildings within a ic highway?		\boxtimes
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1b. Response (Source: GP 2025 Figure CCM-4 Master Plan of Roadways, GP 2025 FPEIR Figure 5.1-1 Scenic and Special Boulevards, Parkways, Table 5.1-A Scenic and Special Boulevards, Table 5.1-B Scenic Parkways, the City's Urban Forest Tree Policy Manual, Title 20 Cultural Resources, Caltrans Scenic Highway Routes, Hunter Business Park Specific Plan)

No Impact. There are no State scenic highways in the City of Riverside (Caltrans 2017). The proposed warehouse would be located at the eastern terminus of Marlborough Avenue, which is a classified as an 88-foot arterial and special boulevard per Figure 5.1-1 and Table 5.1-A of the GP 2025 Final Program Environmental Impact Report (FPEIR). However, there are no special restrictions or regulations associated with the special boulevard designation. Additionally, the project site is currently vacant with no trees or rock outcroppings, and is located within an established industrial business park that does not have

ISSUES (AND SUPPORTING FORMATION SOURCES):	Significant Impact	Significant With Mitigation Incorporated	Significant Impact	No Impact
any historic buildings. Therefore, the project would have no impact or historic buildings within a state scenic highway. No mitigation is a			ng trees, rock	outcroppings,
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			\boxtimes	
1c. Response (Source: GP 2025, GP 2025 FPEIR, Zonin Hunter Business Park Specific Plan)	g Code, Cit	ywide Desig	n and Sign	Guidelines,
Less Than Significant Impact. The project would consist of a sin Park. The project site is adjacent to existing industrial business park of the project site, there is an office and light industrial complex similar to the project site.	development	to the north a	nd west. Direc	ctly northwest
The project site is currently vacant and cleared of vegetation. The procompatible to the surrounding business park and would be subject t standards as well as the City's <i>Citywide Design and Sign Guidelin</i> natural elevation changes, the proposed building would not significate ridgelines south and east of the project site. Therefore, the project character of the area and there would be a less than significant impa	o the Hunter less. Furthermaticantly impact would not	Business Park ore, as discuss of the substantially of the substantial subst	Specific Plan sed in Respon he Box Sprir degrade the e	development ase 1a, due to ags Mountain
d. Create a new source of substantial light or glare which would		\boxtimes		

1d. Response (Source: GP 2025, GP 2025 FPEIR Figure 5.1-2 Mount Palomar Lighting Area, Title 19 Article VIII Chapter 19.556 Lighting, Citywide Design and Sign Guidelines, Hunter Business Park Specific Plan)

Less Than Significant Impact with Mitigation Incorporated. The project would not result in a new source of substantial light or glare which would adversely affect day or nighttime views. No rooftop features which could produce light or glare, such as solar panels, are proposed as part of the project. Currently, nighttime lighting is produced by adjacent industrial properties located to the west and north of the project site. The proposed warehouse would include exterior building lights at entrances, exits, walkways along the building perimeter, and loading areas and parking lot lighting. As the site is currently vacant, the new lighting would incrementally increase ambient nighttime illumination in the area. Any exterior building materials would be constructed in accordance with Title 19, Article VIII, Chapter 19.710 (*Design Review*) of the RMC, and in compliance with the *Citywide Design and Sign Guidelines*. Adherence to Title 19, Article VIII, Chapter 19.556 (*Lighting*) of the Riverside Municipal Code (RMC) would ensure impacts from light or glare from the proposed building would remain within acceptable levels. However, The project site located adjacent to the Box Springs Mountain Reserve Park, which is within the Multi-Species Habitat Conservation Plan (MSHCP) area. Section 6.1.4 of the MSHCP contains Urban/Wildlands Interface Guidelines, which are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area, including impacts from lighting. In order to ensure impacts to the adjacent habitat area from new sources of light are as limited as possible, the following mitigation measures shall be required to ensure potential impacts to the adjacent habitat area from sources of light are less than significant with mitigation incorporated:

MM AES-1: Photometric Plan. Prior to the issuance of building permits, the applicant shall submit a photometric (lighting) plan for approval by the Community & Economic Development Department, Planning Division. The approved light design requirements shall be included on the final building plan sheets. The lighting plan shall incorporate the following requirements:

- The project shall be designed in such a manner as to prevent light spillage from the project to the adjacent and nearby open space areas
- Project lighting shall not exceed an intensity of one foot-candle
- Shielding shall be employed, where feasible
- Any night lighting shall be directed away from natural open space areas and directed downward and towards the center of the development
- No project lights shall blink, flash, oscillate, or be of unusually high intensity or brightness

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
 Energy-efficient LPS or HPS lamps shall be used dampen glare 	ed exclusively		the project si	te to
■ Exterior lights shall be only "warm" LED lights (<3	000K color te	emperature)		
2. AGRICULTURE AND FOREST RESOURCES				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				
2a. Response (Source: GP 2025 Figure OS-2 Agricultural Su	itability)			
No Impact. The project site is not designated as, and is not adjace Farmland, Unique Farmland, or Farmland of Statewide Importan Farmland Mapping and Monitoring Program of the California Reson OS-2 shows the project site as Farmland of Local Importance. How Manufacturing Park and Specific Plan (Hunter Business Park – Indu agricultural resources or operations, including farmlands on or in prohave no impact on agricultural uses. No mitigation is required.	ce, as shown arces Agency ever, the projection of the projection o	on the maps and Figure O ect site is zone strict) Overlay	s prepared pu S-2 of the GP ed BMP-SP – Zones. There	rsuant to the 2025. Figure Business and are no active
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
2b. Response (Source: GP 2025 Figure OS-3 Williamson Williamson Act Preserves and 5.2-4 Proposed Zones Permitti				•
No Impact. Pursuant to Figure OS-3 in the GP 2025 and Figures 5 project site is not located within an area that is affected by a William Moreover, the project site is not zoned for agricultural use. The site the project would have no impact on agricultural uses. No mitigation	nson Act Pres is not next to	erve or under	a Williamson	Act Contract.
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
2c. Response (Source: GIS Map Forest Data)				_
No Impact. The City of Riverside has no designated forest land or tin	nberland as de	efined in Section	ons 12220[g] a	and 4526 of

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With	Less Than Significant Impact	No Impact
FORWIATION SOURCES).	-	Mitigation Incorporated	-	
the <i>California Public Resources Code</i> . Therefore, the project would be mitigation is required.	nave no impac	ets on forest la	nd or timberla	nd. No
d. Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
2d. Response (Source: GIS Map Forest Data)				
No Impact. The City of Riverside has no designated forest land. The proximity of the project site. Therefore, the project would have no mitigation is required.				
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				\boxtimes
2e. Response (Source: GP 2025 Figure OS-2 Agricultural Su Title 19 Article V Chapter 19.130 Industrial Zones BMP, and	• .	-	illiamson A	ct Preserves
No Impact . The project site is zoned Business and Manufacturing For operations. The project would not result in the conversion of desthere are no agricultural resources or operations, including farmla Riverside has no forest land that can support 10 percent native treated to the conversion of Farmland to non-agricultural use or to the	signated farml nds within pr e cover. Ther	and to non-age eoximity of the efore, the proj	ricultural uses e subject site. ect would ha	s. In addition The City of we no impac
3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes	
3a. Response (Source: SCAQMD's 2016 AQMP, SCAG 20 Study))16-2040 RT	TP/SCS, SCA	G Employm	ent Density

Less Than Significant Impact. A project may be inconsistent with the Air Quality Management Plan (AQMP) if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The 2016 AQMP, adopted on March 3, 2017, relies on local city general plans' and the Southern California Association of Government's (SCAG) Regional Transportation Plans' (RTP) forecasts of regional population, housing and employment growth in its own projections for managing Basin air quality.

The proposed project involves the construction of an unrefrigerated warehouse with office space. The project would not provide residential units that would cause a direct increase in the City's population. While the project may provide new employment opportunities in the City of Riverside that could contribute to population growth, this contribution would be nominal. According to an employee density study prepared for SCAG in 2001, warehouse uses in Riverside County employ 16.32 employees per net-acre on average. Thus, the proposed project is expected to employ approximately 273 persons (16.32 employees/acre x 16.7 net-acres) (SCAG 2001). In its 2016 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS), SCAG projects the City of Riverside's number of employees would increase to 200,500 by 2040; an increase of 80,500 persons relative to 2015 (SCAG 2016). Based on these estimates, the project would constitute 0.3 percent of projected employment growth over the next 20 years. Thus, the level of employment growth associated with the project would not exceed the official regional employment projections. Therefore, the project would be consistent with GP 2025 and the AQMP. The project would have a less than significant impact to the implementation of an air quality plan. No mitigation is required.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			\boxtimes	

3b. Response (Source: GP 2025 FPEIR Table 5.3-B SCAQMD Air Quality Significance Thresholds, SCAQMD's 2016 AQMP, CalEEMod, Air Quality and Greenhouse Gas Study [Rincon Consultants 2017c])

Less Than Significant Impact. The project area is within the South Coast Air Basin (SCAB), which is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is the designated air quality control agency for the SCAB. The SCAB is designated a nonattainment area for the federal and state one-hour and eight-hour ozone standards, the state suspended particulate matter (PM₁₀) standard, the federal 24-hour PM_{2.5} standard, and the state and federal annual PM_{2.5} standard (SCAQMD 2016). The SCAB is designated unclassifiable or in attainment for all other federal and state standards. The health effects associated with criteria pollutants upon which attainment of state and federal air quality standards is measured are described in Table 2.

Table 2 Health Effects Associated with Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: pulmonary function decrements and localized lung edema in humans and animals, risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Carbon monoxide (CO)	Reduces oxygen delivery leading to: (1) Aggravation of chest pain (angina pectoris) and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses.
Nitrogen dioxide (NO ₂)	(1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration.
Sulfur dioxide (SO ₂)	(1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ^a
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ^a

^a More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: Office of Environmental Health Hazard Assessment, Particulate Matter Health Effects and Standard Recommendations, www.oehha.ca.gov/air/toxic_contaminants/PM10notice.html#may, May 9, 2002; and EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: US EPA 2016

The SCAQMD adopted the 2016 Air Quality Management Plan (AQMP) on March 3, 2017, which provides a strategy for the attainment of state and federal air quality standards. The SCAQMD recommends the use of quantitative thresholds to determine the significance of temporary construction-related pollutant emissions and project operations. These thresholds are shown in Table 3.

Table 3 SCAQMD Air Quality Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of ROG	55 pounds per day of ROG
100 pounds per day of NOx	55 pounds per day of NO _X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of PM ₁₀	150 pounds per day of SO _X
55 pounds per day of PM _{2.5}	150 pounds per day of PM ₁₀
	55 pounds per day of PM _{2.5}

 $Source: SCAQMD.\ March\ 2015.\ Accessed\ May\ 2017\ at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf$

In addition to the above thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs), which were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size; LSTs have been

developed for emissions within construction areas up to five acres in size. However, LSTs only apply to emissions within a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008). As such, LSTs are typically applied only to construction emissions as the majority of operational emissions are associated with project-generated vehicle trips.

The project site is located in Source Receptor Area 23 (SRA 23), Metropolitan Riverside County (SCAQMD 2008). The SCAQMD provides lookup tables for project sites that measure one, two, three, four, or five acres. The project site is approximately 22.34 gross-acres and grading would occur across approximately 17 acres of the site. However, this analysis assumes that there would be no more than five acres under active construction at one time, and relies on the five-acre LSTs for significance determinations. The five-acre LSTs provide a more stringent threshold for construction emissions compared to the analysis of emissions over a larger area. The closest sensitive receptor is Box Mountain Springs Reserve Park located adjacent to the project site along the southern border. Because the shortest distance for which LSTs are provided is 82 feet (25 meters), this is the distance that was used for project analysis as shown in Table 4.

Table 4 SCAQMD LSTs for Construction (SRA-23)

Pollutant	Allowable construction emissions from a 5-acre site in SRA-23 for receptor 82 feet away (lbs/day)
Gradual conversion of NO _x to NO ₂	270
СО	1,577
PM_{10}	13
PM _{2.5}	8

Source: SCAQMD, October 2009, http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2~accessed~online~May~2017.

The proposed project would involve the construction of a warehouse, with associated office space and vehicular parking. The project's construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.1, per GP 2025 FPEIR MM Air 1 and 7. CalEEMod uses project-specific information, including the project's land uses, square footages for different uses (e.g., residential, parking), and location, as well as model defaults that can be tailored for a specific project to estimate a project's construction and operational emissions. Construction emissions modeled include emissions generated by construction equipment used on-site, such as backhoes and bulldozers, as well as emissions generated by vehicle trips associated with construction, such as hauling trips and employee travel. Operational emissions modeled include mobile source emissions (i.e., vehicle emissions), energy emissions, and area source emissions. Mobile source emissions include emissions generated by delivery truck trips and employee trips to and from the project site associated with operation of the proposed project. Emissions attributed to energy use include natural gas consumption for space and water heating, in addition to the emissions associated with electricity. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coating.

The proposed project was modeled assuming construction of a 339,510 square foot unrefrigerated warehouse space, 6,820 square feet of office space, and 86,698 square feet of vehicular parking. In addition to project details, a construction schedule was provided by the applicant and used for construction phase lengths. The CalEEMod defaults were used for the number and type of equipment used during each phase of construction. Trip generation rates for the warehouse land use were adjusted to match rates used in the Traffic Impact Analysis completed for the project (Rick Engineering 2017b). In addition, it was assumed the project would comply with all applicable regulatory standards, such as SCAQMD Rule 1113, which limits reactive organic gas (ROG) content in flat and non-flat coatings to 50 grams per liter and Rule 403, which requires watering of disturbed ground surfaces to maintain soils in a damp condition during earth-moving activities; it was assumed watering would occur three times a day.

Construction Emissions. Construction activities associated with the proposed project would consist of grading, site preparation, construction of the proposed building, parking lot, and roadway paving, and architectural coating. These construction activities would generate temporary emissions of fugitive dust (measured as particulate matter), exhaust emissions from heavy construction vehicles and soil hauling trucks, and ROGs from architectural coatings. The majority of project-related operational emissions would be due to area emissions and vehicle trips to and from the site.

Table 5 summarizes the estimated maximum daily emissions of pollutants during construction on the project site. As shown in Table 5, construction emissions would not exceed SCAQMD regional or LSTs for any pollutants. Therefore, impacts to regional air quality and local receptors due to construction emissions would be **less than significant**. No mitigation is required.

Table 5 CalEEMod Model Results: Short-Term Construction Impacts

	Daily Emissions (pounds/day)					
Activity	ROG	NOx	СО	SO ₂	PM ₁₀	PM _{2.5}
Daily Project – Emissions Construction ¹	34.0	52.5	47.4	< 0.1	11.2	7.2
SCAQMD Daily Thresholds Construction	75	100	550	150	150	55
Exceeds Threshold? (Y/N)	N	N	N	N	N	N
Daily Project – Onsite Emissions Construction	27.6	52.3	24.3	<0.1	11.0	7.1
LSTs (Onsite only, 82 feet away)	N/A	270	1,577	N/A	13	8
Exceeds Threshold? (Y/N)	N/A	N	N	N/A	N	N

Source: Rincon Consultants 2017c.

Operational Emissions

Table 6 summarizes estimated emissions associated with operation of the proposed project. The majority of project-related operational emissions would be due to area emissions and vehicle trips to and from the site. As shown below, project-generated emissions would not exceed SCAQMD regional thresholds for ROG, NO_X, CO, SO_X, PM₁₀, or PM_{2.5}.

Table 6 CalEEMod Results: Long-Term Operational Impacts

				Daily Emissions (pounds/day)					
ROG	NOx	СО	SO ₂	PM ₁₀	PM2.5				
10.8	25.6	46.4	0.2	12.2	3.4				
55	55	550	150	150	55				
N	N	N	N	N	N				
	10.8	10.8 25.6 55 55	10.8 25.6 46.4 55 55 550	10.8 25.6 46.4 0.2 55 55 550 150	10.8 25.6 46.4 0.2 12.2 55 55 550 150 150				

As demonstrated above, the project would not exceed SCAQMD thresholds and therefore, would not violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation. Direct, indirect, and cumulative impacts related to air quality would be **less than significant**. No mitigation is required.

To further ensure short-term emissions are reduced to the extent possible, Mitigation Measure Air 4 from the GP 2025 FPEIR and SCAQMD Rule 403 directly apply to this project.

GP 2025 FPEIR MM Air 4: To reduce diesel emissions associated with construction, construction contractors shall provide temporary electricity to eliminate the need for diesel powered generators, or provide evidence that electrical hook ups at construction sites are not cost effective or feasible.

SCAQMD Rule 403: To reduce construction related particulate matter air quality impacts of City projects the following measures shall be required:

- 1. Minimization of Disturbance. Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
- 2. Soil Treatment. Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved onsite roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day. The modeling for this project assumed watering would occur three times a day.
- 3. Soil Stabilization. Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. In addition, a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide, shall be utilized to remove bulk material from tires and vehicle undercarriages before vehicles exit the site. If no further grading or excavation operations are planned for the area, the

¹Includes emissions from demolition, grading, paving, building construction, and architectural coating; totals include worker trips, soil export hauling trips, construction vehicle emissions, and fugitive dust.

area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

- 4. No Grading During High Winds. Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
- 5. Street Sweeping. Construction contractors should sweep all onsite driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
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3c. Response (Source: GP 2025 FPEIR Table 5.3-B SCAQMD Air Quality Significance Thresholds, SCAQMD's 2016 AQMP, CalEEMod, Air Quality and Greenhouse Gas Study [Rincon Consultants 2017c])

Less than Significant. Aside from the pollutant concentrations determined to be less than significant based on CalEEMod analysis for the project, heavily congested intersections can lead to long-term mobile emissions that exceed carbon monoxide (CO) standards and lead to CO hotspots. CO hotspots are locations where the federal or State ambient air quality standards could be exceeded because of the concentration of motor vehicles that are idling. Other factors contributing to a CO hotspot include the configuration of the intersection, distance to sensitive receptors, and patterns of air circulation. While the SCAQMD has not established a formal screening threshold for carbon monoxide (CO) hotspot analysis, the Bay Area Air Quality Management District (BAAQMD) has established the following threshold: under existing and future emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour in order to generate a significant CO impact (BAAQMD 2011). According to the Traffic Impact Analysis completed for the project (Rick Engineering 2017b), no intersections affected by the project would be required to accommodate more than 44,000 vehicles per hour even during peak hours under future cumulative conditions. Therefore, no intersection-specific CO modeling is required. No substantial pollutant concentrations would be expected as a result of the project. Direct, indirect, and cumulative impacts would be a **less than significant**. No mitigation is required.

d. Expose sensitive receptors to substantial pollutant		\square	
concentrations?			

3d. Response (Source: GP 2025 FPEIR Table 5.3-B SCAQMD Air Quality Significance Thresholds, SCAQMD's 2016 AQMP, CalEEMod, Air Quality and Greenhouse Gas Study [Rincon Consultants 2017c])

Less Than Significant Impact. Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as land uses that are more likely to be used by these population groups and include health care facilities, retirement homes, school and playground facilities, and residential areas. The sensitive receptors nearest to the project include Highland Elementary School (700 Highlander Drive, Riverside, CA 92507) located approximately three quarters of a mile south of the site, University Heights Middle School (1155 Massachusetts Avenue, Riverside, CA 92507) located approximately three quarters of a mile southwest, single-family residences located approximately a third of a mile south, and Stahovich Mary-US Health Works Medical Group Urgent Care Center (1760 Chicago Avenue, Riverside, CA 92507) located approximately one mile west of the project site. The proposed project would not exceed SCAQMD thresholds for pollutants as discussed above under construction and operational emissions. Therefore, impacts to sensitive receptors from pollutant concentrations would be less than significant.

e. Create objectionable odors affecting a substantial number of		\square	
people?			

3e. Response (Source: SCAQMD CEQA Air Quality Handbook, Air Quality and Greenhouse Gas Study [Rincon Consultants 2017c])

Less Than Significant Impact. The 1993 SCAQMD CEQA Air Quality Handbook identifies land uses associated with odor complaints to be agriculture uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass molding. Warehouses are not identified on this list. In addition, the project would have to comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public. Therefore, the proposed project would not generate objectionable odors affecting a substantial number of people and impacts would be **less than significant**. No mitigation is required.

4. BIOLOGICAL RESOURCES		
Would the project:		
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		

4a. Response (Source: GP 2025 Figure OS-6 Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP) [SKR-HCP], Figure OS-7 MSHCP Cores and Linkages, Figure OS-8 MSHCP Cell Areas, GP 2025 FPEIR Figure 5.4-2 MSHCP Area Plans, Figure 5.4-4 MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 MSHCP Criteria Area Species Survey Area, Figure 5.4-8 MSHCP Burrowing Owl Survey Area, Burrowing Owl Focused Surveys [Rincon Consultants 2017d] and Habitat Assessment [Rincon Consultants 2017b]).

Less Than Significant with Mitigation Incorporated. The proposed project site is located in the Multiple Species Habitat Conservation Plan (MSHCP) survey area for burrowing owl (*Athene cunicularia*: BUOW); therefore, a habitat assessment was conducted on May 4, 2017 by a qualified biologist (Rincon Consultants 2017b and 2017d). The survey area contains elements of suitable habitat for BUOW, including flat, open areas occupied by non-native herbs and grasses, earthen levees and berms, manmade concrete and cement structures, and vacant urban lots. Portions of the survey area are also partially surrounded by fences, which provide perching substrate for BUOW to attain good visibility. The BUOW habitat assessment concluded that no BUOW or sign of BUOW was observed in the survey area or buffer during the focused BUOW survey (Rincon Consultants 2017d). Therefore, BUOW is considered currently absent from the project site and buffer area. However, since suitable habitat is present within the project site there is the potential for BUOW to move onto the site during winter migration or subsequent nesting seasons. Therefore, mitigation measure BIO-1 would be implemented prior to ground-disturbing activities associated with construction activities at 750 Marlborough Avenue to ensure potential impacts to biological resources are less than significant with mitigation incorporated:

MM BIO-1: Burrowing Owl Pre-Construction Survey. A pre-construction survey shall be conducted by a qualified biologist within 30 days prior to initiating ground disturbing activities per Objective 6 of the MSHCP BUOW Species Account. If owls are not present on the project site during the pre-construction survey, the proposed disturbance activities may proceed. In the event that owls are discovered and may be affected by the proposed project, avoidance measure shall be developed in compliance with the MSHCP and in coordination with the CDFW and/or Western Riverside County Regional Conservation Authority.

In addition, California Fish and Game Code 3503 (CFGC) and the Migratory Bird Treaty Act (MBTA) protect native birds and their nests from direct take. The Grassland Habitat available on the project site potentially provides habitat for ground nesters, while the properties adjacent to the project site contain ornamental landscaping that may provide suitable nesting habitat for several avian species. Although no nesting behavior was observed during the habitat assessment, construction occurring within breading season could potentially impact nesting birds. Therefore, mitigation measure BIO-2 has been established to ensure that potential impacts to nesting birds and raptors during construction activities are **less than significant with mitigation incorporated:**

MM BIO-2: Nesting Bird Survey. A pre-construction survey shall be conducted by a qualified biologist within 30 days prior to initiating vegetation removal and/or ground disturbing activities. Vegetation removal and initial ground disturbance should occur outside the nesting bird breeding season between the months of February through August. If project activities occur during the nesting season, which can vary based on annual climatic conditions, geographic location, and avian species requirements; or if potential nesting activity is observed by qualified project personnel, then a nesting bird survey should be conducted by a qualified biologist within one (1) week of proposed construction activities. If active nests of protected native species are located, construction work should be delayed until after the nesting season or until the young are no longer dependent upon the nest site. Construction in the vicinity of an active nest should be conducted at the discretion of a biological monitor.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
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4b. Response (Source: GP 2025 Figure OS-6 SKR-HCP, Figure OS-7 MSHCP Cores and Linkages, Figure OS-8 MSHCP Cell Areas, GP 2025 FPEIR Figure 5.4-2 MSHCP Area Plans, Figure 5.4-4 MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 MSHCP Criteria Area Species Survey Area, Figure 5.4-8 MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and Habitat Assessment [Rincon Consultants 2017b]). No Impact. No wetland or riparian vegetation exists on the project site. Therefore, no impact to any riparian habitat or other				
sensitive natural community identified in local or regional plans, polifish and Game or U.S. Fish and Wildlife Service with implementation is required.	icies, or regula	ations, or by tl	he California I	Department of
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
4c. Response (Source: City of Riverside GIS/CADME US [Rincon Consultants 2017b]).	GS Quad M	lap Layer, d	and Habitat	Assessment
No Impact. There are no federally protected wetlands as defined by limited to, marsh, vernal pool, coastal, etc.) onsite or within proxim any discernible drainage courses, inundated areas, wetland vegetatic jurisdictional drainages or wetlands. Therefore, the project would have by Section 404 of the Clean Water Act. No mitigation is required.	ity to the proj on, or hydric s	ect site. The poils and thus	oroject site doe does not inclu	es not contain ide USACOE
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
4d. Response (Source: MSHCP, MSHCP Cores and Linkag 2017b]).	ge, and Habi	itat Assessm	ent [Rincon	Consultants
Less Than Significant Impact. The project would be subject to the March proposed project would not conflict with GP 2025 Policy OS-6.4 wildlife movement corridor between Sycamore Canyon Wilderness between Box Springs Mountain Reserve and the Santa Ana River via City's GP 2025. The project would also be consistent with GP 20 migration areas in general.	hich requires S Park and the Springbrook	the City to co e Box Spring Wash as ident	ntinue efforts s Mountain R ified in the M	to establish a egional Park, SHCP and the
The project site is located within the Riverside/Norco and the Highgrove Area Plan of the MSHCP, which contains a small portion of the Proposed Constrained Linkage 4, Proposed Constrained Linkage 7, Existing Noncontiguous Habitat Block A, and Core A as described in the Habitat Assessment (Rincon Consultants 2017b). Though the linkages intersect a small portion of the Riverside/Norco and Highgrove Area Plan, the project site is situated at the base of Box Springs Mountain in a primarily flat and previously graded area adjacent to industrially developed areas and is not located in Cells, Cell Groups, or sub-units within the Riverside/Norco and Highgrove Area Plans. The project site does not likely currently support wildlife movement as it is bordered on the north and west by industrial land uses and roads which do not offer any means of movement through or between natural areas or areas with abundant high-quality habitat. As such, the project would not hinder the movement of wildlife.				
Therefore, the project would have a less than significant impact to t wildlife species or the establishment of native resident or migratory nursery sites.				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		\boxtimes		
4e. Response (Source: MSHCP, Title 16 Section 16.72.04	40 Establish	ing the We	estern Rivers	side County

P17-0506, P17-0507, P17-0747, P17-0748 & P17-0749

MSHCP Mitigation Fee, Title 16 Section 16.40.040 Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forestry Policy Manual, Box Springs Mountain Reserve Comprehensive Trails Master Plan, and Habitat Assessment [Rincon Consultants 2017b]).

Less Than Significant with Mitigation Incorporated. Implementation of the proposed project would be subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources, including tree preservation. The project would be required to comply with RMC Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.

The Habitat Assessment completed for the project (Rincon Consultants 2017b) concluded that there are no water features or riparian habitats on the project site as defined under Section 6.1.2 of the MSHCP. The cement-lined culvert near the western boundary of the project site was determined to be unsuitable as quality habitat for riparian/riverine species listed in Section 6.1.2 of the MSHCP. Therefore, no further actions related to riparian/riverine species or habitats are recommended pursuant to the MSHCP, and implementation would not conflict with the MSHCP.

Section 6.1.4 of the MSHCP contains Urban/Wildlands Interface Guidelines, which are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. The project site located adjacent to the Box Springs Mountain Reserve Park. Therefore, the provisions of the guideline in Section 6.1.4 would apply to the project in the following areas:

- **Drainage:** "... measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Area." The project site includes the construction of bioretention facilities on the southwest portion of the project site, designed to capture sheet flow around the paved parking areas on site before conveying water to the existing storm drain on Marlborough Avenue (further discussed in Section 18, Utilities and Services Systems). Furthermore, the project site is downhill from, and lower in elevation than, the hills of Box Springs Mountain Reserve, and naturally convey stormwater and runoff to the proposed biorentention facilities.
- Toxics: "...incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area." Proposed uses for the project site entail warehouse and office uses, which would not be a manufacturer, discharger, or transporter of hazardous materials (further discussed in Section 8, Hazards and Hazardous Materials). Potential hazardous materials such as fuel, paint products, lubricants, solvents, and cleaning products may be used and/or stored on site during the construction and/or operation of the building. However, due to the limited quantities of these materials to be used by the project, they are not considered hazardous to the public or MSHCP Conservation Area at large.
- **Lighting:** "[Light] Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area is not increased." The project would not result in a new source of substantial light or glare which would adversely affect day or nighttime views (further discussed in Section 1, Aesthetics). The proposed warehouse would include exterior building lights at entrances, exits, walkways along the building perimeter, and loading areas and parking lot lighting, which would incrementally increase ambient nighttime light in the area. However, adherence to Title 19, Article VIII, Chapter 19.556 (Lighting) of the RMC, which sets forth standards for lighting to ensure that lighting provided for projects is adequate to light the project for safety while not causing light spillage onto neighboring properties, would ensure impacts from light or glare from the proposed building would remain less than significant. As part of the project review process and as required as part of MM AES-1, the City shall require a photometric plan be submitted and approved prior to the issuance of building permits.
- Noise: "...wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards." Further discussed in Section 12, Noise, several mitigation measures would be implemented to ensure temporary construction noise and operational noise would not exceed residential noise standards. Such measures to reduce construction noise impacts (mitigation measures NOI-3 and NOI-4) entail restricted hours for construction activities, implementation of temporary sound attenuation barriers, and the use of mufflers on all equipment. Measures to reduce operational noise impacts (mitigation measures NOI-1 and NOI-2) include restricted operations during nighttime hours and the installation of noise-attenuating barriers around any rooftop mechanical equipment.
- Invasives. "...consider the invasive, non-native plant species listed in Table 6-2 of the MSHCP and avoid the use of invasive species adjacent to the MSHCP Conservation Area." The project would include extensive landscaping along the southern portion of the property and around the lot boundaries. The project would be required to comply with the Hunter Business Park Specific Plan Landscape requirements, the City of Riverside Landscape Design Guidelines, and Chapter 19.62 of the RMC.

- Barriers. "... incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping in the MSHCP Conservation Area." The project would include barriers such as native landscaping, fencing, walls, and/or other appropriate mechanisms along the lot boundaries to restrict unauthorized public access to the extent feasible. The project does include improvements to the existing public trail that traverses the eastern and southern boundary of the project site. This trail is meant for pedestrian and emergency vehicle access only and use of the trail shall be required to meet the requirements of the City of Riverside Parks, Recreation, and Community Services Department, as well as the Box Springs Mountain Reserve Comprehensive Trails Master Plan (Riverside, County of 2015), which will ensure impacts from the proposed project would remain less than significant.
- Grading/Land Development. "...slopes associated with proposed site development shall not extend into the MSHCP Conservation Area." The project site has relatively flat topography, though adjacent to the slopes of Box Springs Mountain Reserve Park to the northeast and east of the project site. Pursuant to the preliminary grading plans and building plans, the proposed project would not encroach into the adjacent MSHCP Conservation Area.

The GP 2025 Open Space/Conservation Element and the Hunter Business Park Specific Plan Landscape Concept include policies to ensure development does not conflict with any local policies or ordinances protecting biological resources. This project has been reviewed against these policies and found to be in compliance with the policies. Furthermore, the project does not include any planting within the public right-of-way. Therefore, the project would have a **less than significant impact with mitigation incorporated** on local policies and ordinances protecting biological resources.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				
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4f. Response (Source: MSHCP, GP 2025 Figure OS-6 SKR-HCP)

Less Than Significant Impact with Mitigation Incorporated. The project is consistent with the SKR-HCP (Stephens' Kangaroo Rat - Habitat Conservation Plan) and with GP 2025 Policy OS-5.3. The project would be mostly consistent with the guidelines of the MSHCP, including Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlife Interface) and related policies in the GP 2025, including Policy LU-7.4. However, as further discussed in Section 1, *Aesthetics*, and Section 12, *Noise*, several mitigation measures would be implemented to ensure new sources of light and temporary construction noise and operational noise would not significantly impact the surrounding natural open space area. Such measures include limiting glare from new light sources (AES-1), and reducing construction noise impacts (mitigation measures NOI-3 and NOI-4) by restricting hours for construction activities, implementing temporary sound attenuation barriers, and the use of mufflers on all equipment. Measures to reduce operational noise impacts (mitigation measures NOI-1 and NOI-2) include restricted operations during nighttime hours and the installation of noise-attenuating barriers around any rooftop mechanical equipment. Therefore, the project would have a less than significant impact with mitigation incorporated associated with potential inconsistencies with the MSHCP and/or SKR-HCP to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

5. CULTURAL RESOURCES		
Would the project:		
a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA Guidelines?		\boxtimes

5a. Response (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the RMC, Cultural Resources Survey [Rincon Consultants 2017a])

No Impact. A Cultural Resources Study was completed by Rincon Consultants in September 2017, which found no previously recorded cultural resources within the project site. One previously recorded resource, the Gage Canal (P-33-04768), was identified directly adjacent to the project site. The Gage Canal is listed by the City of Riverside as a Cultural Heritage Landmark. The project would include the extension of Marlborough Avenue across the Gage Canal, however the canal runs underground at this location and ground disturbance for the road extension would not extend deep enough to impact the canal. The Gage Canal is crossed by paved roads numerous times throughout its alignment, including by Columbia Avenue approximately 0.25 miles (400 meters) north of Marlborough Avenue. Additionally, walls would be installed along the perimeter of paved areas to ensure proper buffering from existing contours, ensuring the preservation of the Gage Canal adjacent to the project site. Thus, the project would not impact the Gage Canal.

A pedestrian survey of the project area resulted in the identification of previously unrecorded remnants of a historical-period irrigation system. The system is no longer in use and has been significantly damaged and vandalized over the years, and the irrigation system cannot be demonstrated to be associated with events or persons significant in our past. The system does not embody the distinctive characteristics of a type, period, or method of installation nor would it yield information important to history. The irrigation system was recorded on Department of Parks and Recreation Series 523 forms, and was determined to be ineligible for listing in the California Register of Historical Resources. Therefore, the project would have **no impact** on historical resources as defined in Section 15064.5 of the CEQA Guidelines. No mitigation is required.

b. Cause a substantial adverse change in the significance of an	 	
archeological resource pursuant to § 15064.5 of the CEQA		
Guidelines?		

5b. Response (Source: GP 2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5-2 Prehistoric Cultural Resources Sensitivity and Appendix D, Cultural Resources Survey [Rincon Consultants 2017a])

Less Than Significant with Mitigation Incorporated. According to the Cultural Resources Study (Rincon 2017a), there are no known archeological resources present on the project site. Although unlikely, due to previous site grading and the relatively low depth of proposed excavation, subsurface materials could be uncovered during excavation and ground-disturbing activities necessary to construction of the proposed building. This could potentially expose, damage, or destroy previously undiscovered archaeological resources. In addition, during the course of Assembly Bill 52 (AB 52) tribal consultation, a potential tribal artifact was identified either on or adjacent to the southeast portion of the project site, near the existing trail. Therefore, mitigation measures CR-1 through CR-6 shall be implemented during ground-disturbing activities associated with construction and trail improvements at 750 Marlborough Avenue to ensure potential impacts to archaeological and tribal resources are less than significant with mitigation incorporated.

MM CR-1: Plan Review. Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City and interested tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the Applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised.

MM CR-2: Archaeological and Paleontological Monitoring. At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified Archaeological Monitor and Native American Tribal Monitor(s) from the consulting tribes to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

- 1. The Project Archaeologist, in consultation with interested tribes, the Developer and the City, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the Plan shall include:
 - a. Project grading and development scheduling;
 - b. The development of simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists;
 - c. The protocols and stipulations that the Applicant, tribes and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;
 - d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and
 - e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure

MM CR-3.

- 2. In the case of inadvertent discoveries, the consulting Native American tribes or bands will be contacted and provided information of the find, and permitted/invited to perform a site visit when the Project Archaeologist and Tribal monitor makes his/her assessment, so as to provide input. In the case of inadvertent discoveries, the consulting Native American tribes or bands have the right to elect to monitor the project moving forward, should the consulting Native American tribes or bands choose to do so after assessment of the find(s).
- 3. During the project duration, the consulting Native American tribes or bands will be provided copies of any daily/weekly/etc. logs completed by the archaeologist(s) and tribal monitor(s) for review. In addition, the consulting Native American tribes or bands will be provided a copy of the final monitoring report(s) for review.

MM CR-3: Cultural Sensitivity Training. The Project Archaeologist and Native American Monitors from consulting tribes shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

MM CR-4: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries:

- Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and
- 2. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
 - a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
 - b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
 - c. If more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and
 - d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes.

MM CR-5: Human Remains. Cease ground-disturbing activities and notify County Coroner if human remains are encountered. If human remains are unearthed during implementation of the Proposed Project, the City of Riverside and the Applicant shall comply with State Health and Safety Code Section 7050.5. The City of Riverside and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to provide recommendations to the landowner. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

MM CR-6: Native American Cultural Resources. Prior to any grading, the Project Applicant will meet with the Project Archeologist, and the consulting Native American tribes or bands in order to assess the feature, identified during consultation, located on the southeast border of the project boundary to determine the suitability for relocation to a permanent open space area. The consulting Native American tribes or bands shall work with the Project Archaeologist, Project Applicant and the Grading Contractor or appropriate personnel to determine whether the features can be relocated safely and will discuss the most appropriate methods for relocation. Before construction activities may resume in the affected area, any visible artifacts shall be recovered and the features recorded using professional archaeological methods. The current Department of Parks and Recreation (DPR) Forms shall be updated, detailing which features were relocated, the process taken and updated maps provided documentation of the features' new location. The site record should clearly indicate that the features are not in their original location and why they were relocated.

or site or unique geologic feature?						
5c. Response (Source: GP 2025 Policy HP-1.3, Cultural Resources Survey [Rincon Consultants 2017a])						
Less Than Significant with Mitigation Incorporated. The Cultural Resources Study completed by Rincon Consultants found no evidence of paleontological resources within the project site. However, it is possible that subsurface materials could be uncovered during excavation and ground-disturbing activities necessary to the construction of the proposed building. These activities could potentially expose, damage, or destroy previously undiscovered paleontological resources. Therefore, mitigation measure CR-2 would be implemented during ground-disturbing activities associated with construction activities at 750 Marlborough Avenue to ensure potential impacts to paleontological resources are less than significant with mitigation incorporated.						
d. Disturb any human remains, including those interred outside of formal cemeteries?						

c. Directly or indirectly destroy a unique paleontological resource

5d. Response (Source: GP 2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5-2 Prehistoric Cultural Resources Sensitivity, Cultural Resources Survey [Rincon Consultants 2017a])

Less Than Significant with Mitigation Incorporated. The Cultural Resources Study (Rincon 2017) found that the project site was historically occupied by a citrus grove. Historic aerial images indicate that the site was cleared sometime between 1994 and 2002. Based on extensive and consistent disturbance of the project site associated with previous land uses, is it unlikely that human remains are interred on the site. However, excavation and ground disturbing activities necessary to construct the proposed building could potentially uncover, damage, or destroy previously undiscovered human remains. Therefore, mitigation measure CR-5 would be implemented during ground-disturbing activities associated with construction activities at 750 Marlborough Avenue to ensure to ensure potential impacts to human remains are less than significant with mitigation incorporated.

6. GEOLOGY AND SOILS					
Would the project:					
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.					
6i. Response (Source: GP 2025 Figure PS-1 Regional Geotechnical Report)	Fault Zones	& GP 202	25 FPEIR	Appendix E	
No Impact. The entire southern California region, including the However, there are no Alquist-Priolo Fault Zones in Riverside, and The nearest active Alquist-Priolo Fault Zones are the San Jacinto F miles northeast and 19 miles southwest of the project site, respective the project site is low. The project has no impact related to rupture of	the project sit ault and the E ely. Therefore	e does not cor disinore Fault, , the potential	ntain any knov located appro for fault rupt	wn fault lines. eximately five ture at or near	
ii. Strong seismic ground shaking?			\boxtimes		
6ii. Response (Source: GP 2025 FPEIR Appendix E Geotechnical Report) Less than Significant Impact. The entire southern California region, including the project area, is considered seismically active. Therefore, the project could be subject to ground shaking generated from activity on regional faults. The San Jacinto Fault Zone and the Elsinore Fault Zone are located five miles northeast and 19 miles southwest of the project site, respectively. Both faults have the potential to cause moderate to large earthquakes that would result in intense ground shaking. The proposed warehouse structure is not intended for permanent, full-time occupancy. However, the building would be required to comply with applicable CBC Title 24 regulations, which establish engineering standards appropriate for the potential seismic hazards of the project site. Compliance with Title 24 regulations would result in a structure designed to resist structural collapse and thereby provide reasonable protection from serious injury, catastrophic property damage, and loss of life as a result of strong seismic ground shaking. Therefore, the project would have less than significant impact related to seismic ground shaking. No mitigation is required.					
iii. Seismic-related ground failure, including liquefaction?					
6iii. Response (Source: GP 2025 Figure PS-1 Regional Fault Zones, Figure PS-2 Liquefaction Zones, GP 2025 FPEIR Figure PS-3 Soils with High Shrink-Swell Potential, and GP 2025 FPEIR Appendix E Geotechnical Report) No Impact. The project site is located in an area with low potential for liquefaction as depicted in the GP 2025 Liquefaction Zones Map Figure PS-2. Compliance with CBC regulations and implementation of standard engineering and construction protocols would ensure that impacts related to seismic-related ground failure, including liquefaction would have no impact. No mitigation is required.					
iv. Landslides?					
6iv. Response (Source: GP 2025 FPEIR Figure 5.6-1 Are		•	- '		

Code)

Less Than Significant Impact. The project site itself has generally flat topography in an area not prone to landslides per Figure 5.6-1 of the GP 2025 Program Final PEIR. The slope that forms the foothills of the Box Springs Mountain Reserve Park gradually increases from 15 to 30 percent to the east and south of the project site. The GP 2025 FPEIR states that seismically induced landslides and rockfalls could be expected in the northeastern area of the City associated with the Box Springs Mountain Reserve Park. The GP 2025 FPEIR does not contain mitigation measures specific to landslides. The project would incorporate a retaining wall along the eastern boundary of the project site, adjacent to the northwestern foothill of Box Springs Mountain Reserve. The retaining wall would serve as a structural barrier to potential landslides and rockfalls. In addition, the proposed building would be set back nearly 200 feet from the base of the hill, and the building itself would

be required to meet CBC standards. Therefore, there would be a less than significant impact related to landslides directly, indirectly and cumulatively. No mitigation is required.					
b. Result in substantial soil erosion or the loss of topsoil?			\boxtimes		
6b. Response (Source: GP 2025 FPEIR Figure 5.6-1 Area Table 5.6-B Soil Types, Riverside Municipal Code Title 18 Su			1 / 0		
Less Than Significant Impact. Soil erosion is the process by which water, or gravity. Most natural erosion occurs at slow rates; however altered and left in a disturbed condition. The project site contains moderate erosivity, according to Figure 5.6-4 and Table 5.6-B in the temporary erosion of topsoil during grading activities. However, uploose or exposed topsoil, and conditions that would cause long-terelatively flat topography present at the project site, grading and deerosion or loss of topsoil. Therefore, the project would have a less the No mitigation is required.	or, the rate of a soil types A e GP 2025 FP on project corm erosion wavelopment act	erosion increarlington and I EIR. Construction, the ould not be privities would a	ses when land Hanford that I tion activities site would no resent. Comb not result in so	is cleared or have slight to may result in t contain any ined with the abstantial soil	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?					
6c. Response (Source: GP 2025 Figure PS-1 Regional Fault PS-3 Soils with High Shrink-Swell Potential, GP 2025 FPE Figure 5.6-4 Soils, Table 5.6-B Soil Types, and GP 2025 FPE	IR Figure 5.	6-1 Areas \overline{U}	nderlain by	Steep Slope,	
No Impact. The project site is generally flat, and on-site soils have Figure PS-3 and Table 5.6B of the FPEIR. As described previous susceptible to landslides or liquefaction, and the site is not located on not cause the project site to become unstable. Therefore, the project subsidence, liquefaction or collapse. No mitigation is required.	sly in this se n an existing f	ction, the pro ault. Impleme	oject site is notation of the	ot considered project would	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?					
6d. Response (Source: GP 2025 FPEIR Figure 5.6-4 Soils, Figure 5.6-4 Soils, Table 5.6-B Soil Types, Figure 5.6-5 Soils with High Shrink-Swell Potential, GP 2025 FPEIR Appendix E Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the RMC) No Impact. Pursuant to Figure 5.6-4 and Table 5.6-B of the GP 2025 FPEIR, the project site does not contain expansive soils. Therefore, the project would have no impact resulting in substantial risks to life or property due to expansive soils. No mitigation is required.					
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?					
6e. Response (Source: GP 2025 FPEIR Figure 5.6-4 Soils, T	able 5.6-B Se	oil Types)			
No Impact. The proposed warehouse building would be served by construction or use of septic tanks or alternative waste water disposa to soils incapable of adequately supporting the use of septic tanks or is required.	l systems. The	erefore, there	would be no i	mpact related	

7. GREENHOUSE GAS EMISSIONS			
Would the project:			
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		\boxtimes	
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?		\boxtimes	

7a. & 7b.) Response (Source: Western Riverside Council of Governments Subregional Climate Action Plan; Riverside Restorative Growthprint; Air Quality and Greenhouse Gas Study [Rincon Consultants 2017c updated February 2018])

Less Than Significant Impact. Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. Climate change is the result of numerous, cumulative sources of greenhouse gases (GHGs). GHGs contribute to the "greenhouse effect," which is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature.

GHGs occur naturally and from human activities. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock; deforestation activities; and some agricultural practices. GHGs produced by human activities include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Emissions of GHGs affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way in which the Earth absorbs gases from the atmosphere. Potential impacts of global climate change in California may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CEC March 2009).

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill 32 became effective on January 1, 2017 and requires the California Air Resources Board (ARB) to develop technologically feasible and cost effective regulations to achieve the targeted 40 percent GHG emission reduction. ARB is currently working to update the Scoping Plan to provide a framework for achieving the 2030 target. The updated Scoping Plan is expected to be completed and adopted by ARB in 2017 (ARB 2017). The Proposed Scoping Plan calls for emissions reductions at the State level that meet or exceed the statewide GHG target, and notes that additional effort will be needed to maintain and continue GHG reductions to meet the mid- (2030) and long-term (2050) targets. However, there is currently no detailed pathway to achieve the reductions. Additionally, the proposed Scoping Plan recognizes the need to reach beyond statewide policy and engage local jurisdictions to develop plans to address local conditions and provide a "fair share" contribution towards the achievement of the State's GHG reduction targets. To assist local planning efforts with developing strategies to meet these targets, ARB has developed the annual community-wide thresholds of no more than six metric tons CO₂e per capita by 2030 and no more than two metric tons CO₂e per capita by 2050.

The Riverside City Council approved the Sustainable Riverside Policy Statement (SRPS) in 2005 and is committed to becoming a greener, more sustainable community. The SRPS emphasizes the implementation of cleaner, greener, and more sustainable programs. Riverside's 38 point Green Action Plan focuses on energy, greenhouse gas emissions, waste reduction, urban design, urban nature, transportation, and water.

The City of Riverside's 2025 General Plan includes policies that ensures that GHG emissions will be reduced in future City of Riverside development and operations. The relevant policies are listed below:

• Policy AQ-8.2: Support appropriate initiatives, legislation, and actions for reducing and responding to climate change.

- Policy AQ-8.3: Encourage community involvement and public-private partnerships to reduce and respond to global warming.
- Policy AQ-2.4: Monitor and strive to achieve performance goals and/or VMT reduction, which are consistent with SCAG's goals.

Additionally, the Western Riverside Council of Governments (WRCOG) completed a subregional climate action plan (CAP) in 2014 that encompasses twelve cities in the subregion, including Riverside, that have joined efforts to develop the CAP (WRCOG 2014). The CAP sets forth a subregional emissions reduction target, emissions reduction measures, and action steps to reduce GHG emissions and demonstrate consistency with the California's Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). The CAP contains GHG reduction measures organized into four primary sectors, as follows: energy, transportation and land use, solid waste, and water. If fully implemented, the CAP would exceed WRCOG's 2020 goal by 2.1 percent, achieving an overall 17.1 percent reduction in GHG emissions by 2020.

Then, in January 2016, Riverside adopted the Riverside Restorative Growthprint (RRG), which combines two plans: the Economic Prosperity Action Plan (RRG-EPAP) and the Climate Action Plan (RRG-CAP) (Resolution No. 22942, City of Riverside 2016d). The RRG-CAP expands upon the subregional CAP and provides a path for the City to achieve reductions in GHG emissions through 2035, while the RRG-EPAP provides a framework for smart growth and low-carbon economic development. The City's baseline GHG emissions inventory (2007) is a benchmark for tracking the City's progress in achieving future reductions. The community-wide inventory identifies the quantity of GHG emissions produced by residents, businesses, and municipal government operations. The inventory reflects the emissions generated within the City that result from the operation of motor vehicles, use of electricity and natural gas, and disposal of solid waste. In 2007, the City's total community-wide emissions were estimated at 3,024,066 MT of CO2e; while emissions resulting from municipal operations were responsible for approximately 122,525 MT of CO2e. In 2010, the City conducted a second inventory that indicated the City's emissions had decreased by approximately 13.4 percent over the three year time period. That reduction is largely attributed to the City's actions to reduce the carbon intensity of its electricity portfolio, as supplied by municipally-owned Riverside Public Utilities (RPU). In addition, the City's energy efficiency and renewable energy incentive programs have helped reduce energy use by residential, commercial, and industrial customers; while solid waste diversion efforts have helped decrease emissions that result from landfill disposal (City of Riverside 2016e).

Through the WRCOG subregional CAP process, the City has committed to a 2020 emissions target of 2,224,908 MT of CO2e, which is 26.4 percent below the City's 2007 baseline and 15 percent below 2010 emissions. This represents a reduction of 779,304 MT CO2e from the City's 2020 business-as-usual (BAU) forecast. The City is aiming for a 2035 emissions target of 1,542,274 MT of CO2e, which is 49 percent below the 2007 baseline and represents a reduction of 2,120,931 MT of CO2e from the 2035 BAU forecast. This 2035 emissions target is derived from a straight-line interpolation of the state-wide AB 32 goal and Executive Order (EO) S-3-05, which aims for 80 percent below 1990 levels by 2050, and is equivalent to 40 percent below 1990 levels. Through state and regional measures implemented at the subregional level, the City of Riverside anticipates significant reductions from the City's 2020 and 2035 BAU emissions forecasts (949,572 MT of CO2e and 1,398,918 MT of CO2e, respectively). The RRG-CAP is a qualified GHG reduction strategy that can be used to streamline the analysis of GHG emissions under the streamlining provisions of California Environmental Quality Act (CEQA) Guidelines Section §15183.5. In guidance provided by the SCAQMD's GHG CEQA Significance Threshold Working Group in September 2010, SCAQMD considered a tiered approach to determine the significance of residential and commercial projects. The draft tiered approach is outlined in meeting minutes dated September 29, 2010.

Tier 1. If the project is exempt from further environmental analysis under existing statutory or categorical exemptions, there is a presumption of less than significant impacts with respect to climate change. If not, then the Tier 2 threshold should be considered.

Tier 2. Consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines section 15064(h)(3), 15125(d) or 15152(a). Under this Tier, if the proposed project is consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions. If there is not an adopted plan, then a Tier 3 approach would be appropriate.

Tier 3. Establishes a screening significance threshold level to determine significance. The Working Group has provided a recommendation of 3,000 metric tons (MT) of CO2e per year for residential/commercial projects.

Tier 4. Establishes a service population efficiency threshold to determine significance. The Working Group has provided a recommendation of 3.0 MT of CO2e per year for land use projects and 4.1 MT of CO2e per year for plans based on statewide service population to achieve statewide 2035 targets.

Tier 2 is the most appropriate threshold for the proposed project as the City of Riverside has adopted a local qualified GHG

reduction plan. Project emissions were still calculated and provided for informational purposes, but significance is determined based on the project's consistency with all applicable RRG-CAP strategies.

Construction Emissions

Construction of the proposed project would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Construction activity was assumed to occur over a period of approximately ten months, based on information provided by the project applicant. As shown in Table 6, construction activity for the project would generate an estimated 552.6 MT of CO₂e. When amortized over a 30-year period, construction of the project would generate about 18.4 MT of CO₂e per year.

Table 6 Estimated GHG Emissions: Construction

Emission Source	Emissions (Metric Tons Co2e/Year)
Construction 2017	259.3
Construction 2018	293.3
Total	552.6
Amortized over 30 years	18.4
Source: Rincon Consultants 2017c.	

Operational Emissions

Table 7 combines the operational and mobile GHG emissions associated with development of the project. The annual emissions would total approximately 4,307 MT of CO₂e.

Table 7 Estimated GHG Emissions: Operational

Operational Emissions Source	GHG Emissions (MTCO ₂ e)/year)*
Operational (Mobile) Sources	2,810.1
Area Sources	<0.1
Energy	593.7
Solid Waste	163.7
Water	739.6
Total	4,307.1

Source: Rincon Consultants 2017c. *MT=Metric Tons

As mentioned above, the project would result in total annual GHG emissions of 4,325.5 MT CO₂e (30-year amortized construction emissions of 18.4 MT CO₂e, combined with annual operational emissions of 4,307.2 MT CO₂e).

As discussed above, the RRG-CAP serves as a Qualified GHG Reduction Strategy consistent with State CEQA Guidelines and outlines a programmatic approach to review the potential GHG-related impacts associated with new development. As detailed in Table 8, the project would be consistent with the following RRG-CAP Emission Reduction Strategies and supportive state regulations.

Table 8 Riverside Restorative Growthprint - Climate Action Plan Emission Reduction Strategies Consistency

Measure/Regulation	Project Consistency
State and Regional Regulations	
Energy	
California Building Energy Efficiency Standards (Title 24, Part 6). Maximize energy efficiency building and	Consistent. The proposed project will comply with the requirements of the 2016 California Building Energy
appliance standards, and pursue additional efficiency efforts	Efficiency Standards (Title 24, Part 6) including measures to
including new technologies, and new policy and	incorporate energy-efficient building design features.
implementation mechanisms. Pursue comparable investment	
in energy efficiency from all retail providers of electricity in	

California (including both investor-owned and publicly owned utilities).

Water

Water Use Efficiency. Reduce per capita water use by 20% by 2020. SB X7-7 is part of a California legislative package passed in 2009 that requires urban retail water suppliers to reduce per-capita water use by 10% from a baseline level by 2015, and to reduce per capita water use by 20% by 2020. Green accountability performance (GAP) Goal 16 directly aligns with SB X7-7. In Southern California, energy costs and GHG emissions associated with the transport, treatment, and delivery of water from outlying regions are high. Therefore, the region has extra incentive to reduce water consumption. While this is considered a state measure, it is up to the local water retailers, jurisdictions, and water users to meet these targets.

Consistent. The proposed project will comply with the requirements of Title 19 – Article VIII – Chapter 19.570 – Water Efficient Landscaping and Irrigation, including measures to increase water use efficiency. Water efficient irrigation systems and devices and drought tolerant landscaping will be installed on the project site.

Solid Waste

Construction and Demolition Waste Diversion. Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 90% of C&D waste from landfills by 2035.

Consistent. In compliance with CalGreen requirements, at least 65% of all nonhazardous construction waste generated by the proposed project would be recycled and/or salvaged (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). Furthermore, 100% of excavated soil shall be reused or recycled.

Transportation

Pavley and Low Carbon Fuel Standard (LCFS). ARB identified this measure as a

Discrete Early Action Measure. This measure would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. Consistent. The project does not involve the manufacture, sale, or purchase of vehicles. However, vehicles that operate within and access the project site will comply with Pavley and Low Carbon Fuel Standard. Medium duty and heavy duty trucks and trailers working from the proposed warehouse will be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the project will interfere with implementation of these requirements and programs.

RRG-CAP Measures

Energy Measures

E-1: Traffic and Street Lights

Replace traffic and street lights with high-efficiency bulbs.

Not Applicable. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable energy efficiency requirements related to lighting detailed in the Green Building Standards Code (Title 24, California Code of Regulations).

E-2: Shade Trees

Strategically plant trees at new residential developments to reduce the urban heat island effect.

Not Applicable. This objective is aimed at government agencies and private developers of residential projects.

E-3: Local Utility Programs – Electricity

Financing and incentives for business and home owners to make energy efficient, renewable energy, and water conservation improvements

Not Applicable. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable energy efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations).

E-4: Renewable Energy Production on Public Property Large scale renewable energy installation on publicly owned

property and in public rights of way.

Not Applicable. This objective is aimed at government agencies, not private developers.

E-5: UCR Carbon Neutrality

Collaborate with UCR to achieve a carbon neutral campus.

Not Applicable. This objective is aimed at government agencies and the University of California, Riverside, not private developers.

E-6: RPU Technology Grants RPU grant programs to foster research, development and demonstration of innovative solutions to energy problems.	Not Applicable. This objective is aimed at government agencies, not private developers.
Transportation Measures	
T-1: Bicycle Infrastructure Improvements Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails.	Consistent. All collector and arterial streets in Hunter Business Park provide bike lanes. Class 2 bike lanes are provided on Columbia and Iowa Avenues and Spruce Street. These bike lanes are consistent with the bicycle routes shown on the Circulation/Transportation element of the City's General Plan and connect with city wide routes. A bikeway is also designated along the Gage Canal. The project would extend Marlborough across the Gage Canal, but would not block public access to the bikeway as improvements will be made to ensure continued access to the canal bikeway via the cul-de-sac sidewalk.
T-2: Bicycle Parking Provide additional options for bicycle parking. T-3: End of Trip Facilities Encourage use of non-motorized transportation modes by	Consistent. The project would comply with RMC Chapter 10.64 regarding bicycle accommodations.
T-4: Promotional Transportation Demand Management Encourage Transportation Demand Management strategies.	Consistent. Pursuant to Chapter 19.88 of the Riverside Municipal Code, businesses generating one hundred or more employees are required to prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook, published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: Alternative work schedules/ flex-time Carpool parking Bicycle parking and shower facilities Information center for transportation alternatives Rideshare vehicle loading areas Vanpool vehicle accessibility Bus stop improvements On-site child care facilities Onsite amenities such as cafeterias Transit incentives for employees, such as subsidy of bus passes Use of low and/or ultra-low fleet vehicles The proposed project would be required to implement feasible methods, including but not limited to those listed, to reduce work-related vehicle trips by 6.5 percent.
T-5: Traffic Signal Coordination Incorporate technology to synchronize and coordinate traffic signals along local arterials.	Not Applicable. This objective is aimed at government agencies, not private developers.
T-6: Density Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities.	Consistent. The project would increase employment opportunities in the City of Riverside by approximately 273 jobs. It is assumed that many of these jobs would be filled by local residents. By providing local jobs, the project would improve the jobs-housing balance and help reduce vehicle miles traveled by local residents.
T-7: Mixed-Use Development Provide for a variety of development types and uses.	Not Applicable. This objective is aimed at government agencies, not private developers. Furthermore, the project site is not designated mixed-use.
T-8: Pedestrian-Only Areas Encourage walking by providing pedestrian-only community areas	Consistent. Hunter Business Park provides a pedestrian network along streets and onsite internal pedestrian walkways. Sidewalks are required on all arterial and collector

streets. Inclusion of plans for pedestrian access and circulation for this project would be submitted for review and approval as a condition of the City's Design Review Process. The project would also be required to comply with RMC Chapter 19.580.080 G regarding pedestrian access and circulation, with primary pedestrian access proposed from Research Park Drive.

In addition, the Hunter Business Park Specific Plan encourages development projects exceeding 250 employees or 15 acres to include employee open space. The project includes the development of a ten-foot-wide multi-use trail, made of decomposed granite material as specified by City of Riverside Parks and Recreation Department, which would run along the southern and eastern sides of the project. The trail would be sloped to a drainage ditch/channel that generally runs along the southern and eastern side of the trail for storm water protection. As the trail is needed for fire protection, the trail would provide 12-foot clearance for fire service vehicles and designed to keep the maximum slope no greater than 15 percent where feasible. The trail will also be used for maintenance purposes to help maintain the proposed graded slopes and the storm water protection system, which consists of the drainage ditch/channel adjacent to the trail and the proposed storm drain that is proposed under the trail. Lastly the trail will be used as a public recreational trail as part of the City of Riverside trail network.

The project would improve access by pedestrians, hikers, mountain bikers, or equestrian to the 15 miles of trails throughout Box Springs Mountain Reserve Park located along the southern border of the project site and be able to encourage employees to utilize the open space area.

T-9: Limit Parking Requirements for New Development Reduce requirements for vehicle parking in new development projects.

Not Applicable. This objective is aimed at government agencies, not private developers. The project would comply with applicable City parking requirements.

T-10: High Frequency Transit Service

Implement bus rapid transit service in the subregion to provide alternative transportation options.

Not Applicable. This objective is aimed at government agencies, not private developers. However, the proposed project would be located a half-mile from the Riverside-Hunter Park bus stop, which would encourage employees to use transit.

T-11: Voluntary Transportation Demand Management

Encourage employers to create TDM programs for their employees

Consistent. Pursuant to Chapter 19.88 of the RMC, businesses generating one hundred or more employees shall prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to:

- Alternative work schedules/ flex-time
- Carpool parking
- Bicycle parking and shower facilities
- Information center for transportation alternatives
- Rideshare vehicle loading areas
- Vanpool vehicle accessibility
- Bus stop improvements
- On-site child care facilities
- Onsite amenities such as cafeterias
- Transit incentives for employees, such as subsidy of bus passes
- Use of low and/or ultra-low fleet vehicles

The proposed project would be required to implement feasible methods, including but not limited to those listed, to

	reduce work-related vehicle trips by 6.5 percent.		
T-12: Accelerated Bike Plan Implementation Accelerate the implementation of all or specified components of a jurisdiction's adopted bike plan.	Not Applicable. This objective is aimed at government agencies, not private developers. However, the proposed project would not obstruct the implementation of the adop bike plan.		
T-13: Fixed Guideway Transit By 2020, complete feasibility study and by 2025 introduce a fixed route transit service in the jurisdiction.	Not Applicable. This objective is aimed at government agencies, not private developers.		
T-14: Neighborhood Electric Vehicle Programs Implement development requirements to accommodate Neighborhood Electric Vehicles and supporting infrastructure.	Not Applicable. This objective is aimed at government agencies, not private developers.		
T-15: Subsidized Transit Increase access to transit by providing free or reduced passes	Consistent. Pursuant to Chapter 19.88 of the RMC, businesses generating one hundred or more employees shall prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: • Alternative work schedules/ flex-time • Carpool parking • Bicycle parking and shower facilities • Information center for transportation alternatives • Rideshare vehicle loading areas • Vanpool vehicle accessibility • Bus stop improvements • On-site child care facilities • Onsite amenities such as cafeterias • Transit incentives for employees, such as subsidy of bus passes • Use of low and/or ultra-low fleet vehicles The proposed project would be required to implement feasible methods, including but not limited to those listed, to reduce work-related vehicle trips by 6.5 percent.		
T-16: Bike Share Program Create nodes offering bike sharing at key locations throughout the City.	Not Applicable. This objective is aimed at government agencies, not private developers.		
T-17: Car Share Program Offer Riverside residents the opportunity to use car sharing to satisfy short-term mobility needs.	Consistent. Pursuant to Chapter 19.88 of the RMC, businesses generating one hundred or more employees shall prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to:		
	 Alternative work schedules/ flex-time Carpool parking Bicycle parking and shower facilities Information center for transportation alternatives Rideshare vehicle loading areas Vanpool vehicle accessibility Bus stop improvements On-site child care facilities Onsite amenities such as cafeterias Transit incentives for employees, such as subsidy of bus passes Use of low and/or ultra-low fleet vehicles 		

T-18: SB 743 - Alternative to LOS	The proposed project would be required to implement feasible methods, including but not limited to those listed, to reduce work-related vehicle trips by 6.5 percent. Not Applicable. This objective is aimed at government		
Use SB 743 to incentivize development in the downtown and other areas served by transit.	agencies, not private developers. Furthermore, the project is not located in a transit priority area.		
T-19: Alternative Fuel & Vehicle Technology and Infrastructure Promote the use of alternative fueled vehicles such as those powered by electric, natural gas, biodiesel, and fuel cells by Riverside residents and workers.	Consistent. Pursuant to Chapter 19.88 of the RMC, businesses generating one hundred or more employees shall prepare and submit a trip reduction plan to reduce work-related vehicle trips by 6.5 percent from the number of trips related to the project as indicated in the most current edition of the Trip Generation Handbook published by the Institute of Traffic Engineers (ITE). Methods to achieve the vehicle reduction targets may include, but are not limited to: • Alternative work schedules/ flex-time • Carpool parking • Bicycle parking and shower facilities • Information center for transportation alternatives • Rideshare vehicle loading areas • Vanpool vehicle accessibility • Bus stop improvements • On-site child care facilities • Onsite amenities such as cafeterias • Transit incentives for employees, such as subsidy of bus passes • Use of low and/or ultra-low fleet vehicles • The proposed project would be required to implement feasible methods, including but not limited to those listed, to reduce work-related vehicle trips by 6.5		
T-20: Eco-Corridor/Green Enterprise Zone Create a geographically defined area(s) featuring best practices in sustainable urban design and green building focused on supporting both clean-tech and green businesses.	Not Applicable. This objective is aimed at government agencies, not private developers.		
Water Measure			
W-1: Water Conservation and Efficiency Reduce per capita water use by 20 percent by 2020.	Consistent. The proposed project would be required to be consistent with applicable water efficiency requirements detailed in the Green Building Standards Code (Title 24, California Code of Regulations). As such, the project would be equipped with low-flow plumbing fixtures that reduce water use.		
Solid Waste Measures			
SW-1: Yard Waste Collection Provide green waste collection bins community-wide.	Consistent. This objective is aimed at government agencies, not private developers. Nonetheless, the project would comply with applicable solid waste requirements.		
SW-2: Food Scrap and Compostable Paper Diversion Divert food and paper waste from landfills by implementing commercial and residential collection program.	Consistent. The project would be required to participate in applicable waste diversion programs. The project would also be subject to all applicable State and City requirements for solid waste reduction.		
Food, Agriculture, and Urban Forest Measures			
A-1: Local Food and Agriculture Promote local food and agricultural programs	Not Applicable. This objective is aimed at government agencies, not private developers.		
A-2: Urban Forest Augment City's Urban and Community Forest Program to include an Urban Forest Management Plan	Consistent. The project would be required to comply with the Hunter Business Park Specific Plan Landscape requirements, the City of Riverside Landscape Design Guidelines, and Chapter 19.62 of the RMC. The proposed landscape plan includes the planting of approximately 150 new trees around the building.		

Source: Rincon Consultants 2017c.				
As shown in Table 8, the project would be consistent with all appropriate the project would designations (further discussed in Section 10, Land Use and Plantintended to reduce GHG emissions statewide, and would be considered to GHG emissions. Therefore, the project would have a less than	be consistent nning), would stent with app	with application application with application with application application with application application with application with application application application with application application with application applicat	able land use with any star and program	e and zoning te regulations s designed to
8. HAZARDS & HAZARDOUS MATERIALS				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
8a. Response (Source: GP 2025 Public Safety Element, GP 2 Title 49 of the Code of Federal Regulations, Hunter Business		•	Health and S	Safety Code,
Less Than Significant Impact. Potential hazardous materials, such a products, may be used and/or stored on site during the construction a to the limited quantities of these materials to be used by the project, to In accordance with the City's Hazardous Materials Policy, the transpostruction and operation of the site would be conducted pursuant to but not limited to Title 49 of the Code of Federal Regulations implement (CCR), which describes strict regulations for the safe transportation County's Department of Environmental Health. As required by California establish and implement a Hazardous Materials Business Emplemental release of a hazardous material in accordance with the start Section 25503 if the business handles a hazardous material or a mixt at any one time, above the thresholds described in Section 25507(a) warehouse and associated office space, would not entail the manufact with all applicable local, State, and federal laws would ensure a less to or disposal of hazardous materials. No mitigation is required.	nd/or occupan they are not co port, use, and so o all applicab- tented by Title of hazardou ornia Health andergency Plan indards prescrib ure containing (1) through (6) cturing or disp	cy of the proponsidered haza storage of hazale local, State 13 of the Calas materials, and Safety Codfor emergence bed in the regulation of the company of t	osed project. Indous to the pardous material and federal latifornia Code and in cooperate Section 255 by response to alations adopted material that he, the proposedous materials	However, due ublic at large, als during the ws, including of Regulations ation with the 07, a business of a release or ed pursuant to has a quantity, d land use, as a Compliance
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				\boxtimes
8b. Response (Source: GP 2025 Public Safety Element, GF Business Park Specific Plan)	P 2025 FPE	IR Tables 5.	7 A through	D, Hunter
No Impact. The proposed building would not entail the manufactur response to 8a, potential hazardous materials such as fuel, paint prodused and/or stored on site during the construction and/or operation of these materials to be used by the project, they are not considered by would have no impact for creating a significant hazard to the pub	ucts, lubricant the building. azardous to the	s, solvents, an However, due he public at la	d cleaning pro to the limited arge. Therefor	oducts may be I quantities of e, the project

upset and accident conditions involving the release of hazardous materials into the environment. No mitigation is required.

c. Emit hazardous emissions or handle hazardous or acutely	 	
hazardous materials, substances, or waste within one-quarter mile		
of an existing or proposed school?		

8c. Response (Source: GP 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D CalARP RMP Facilities in the Project Area, Figure 5.13-2 RUSD Boundaries, Table 5.13-D RUSD Schools, Hunter Business Park Specific Plan)

No Impact. The nearest schools are Highland Elementary School (700 Highlander Drive) and University Heights Middle School (1155 Massachusetts Avenue), both located approximately 0.8 miles south of the project site. It is not anticipated that the use of the proposed warehouse building would include the emission or handling of hazardous materials, substances, or waste. The project would have no impact regarding emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly or

cumulatively. No mitigation is required.					
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?					
8d. Response (Source: GP 2025 Figure PS-5 Hazardous Was Facility Information, Figure 5.7-B Regulated Facilities in Database Listed Sites)					
No Impact. A review of the Cortese List database and the Federal government's Superfund Site database found that the project site is not listed as a hazardous materials site. The nearest hazardous materials site is located at 875 Michigan Avenue, approximately 2,000 feet north of the project site, and is not included on the national priorities list since soil contaminants of concern (sodium hydroxide) were removed from the site (EPA 2017). There are no other hazardous sites listed within a 1,000-foot radius of the project site. Therefore, the project would have no impact on creating a significant hazard to the public or environment. No mitigation is required.					
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?					
8e. Response (Source: GP 2025 Figure PS-6 Airport Safet Airport Land Use Compatibility Plan [RCALUCP 2014])	y Zones and	l Influence	Areas, River	side County	
No Impact. The project site is not located within two miles of a publ 4.5 miles west. March Air Reserve Base/Inland Port Airport is locat within the March Air Reserve Base/Inland Port Airport Land Use reviewed by the Airport Land Use Commission on July 13, 2017 and Compatibility Plan. Therefore, the project would have no impact on residing or working in the project area.	ted approxima e Compatibili d was found to	tely 7 miles so ty Plan influe to be consistent	outheast. The ence area. The t with the Airp	project site is e project was port Land Use	
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?					
8f. Response (Source: GP 2025 Figure PS-6 Airport Safety	Zones and	Influence Ar	reas)		
No Impact. The project site is not located in the vicinity of a private related to the safety of people near private airstrips. No mitigation is		refore, the pro	ject would ha	ve no impact	
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?					
8g. Response (Source: GP 2025 FPEIR Chapter 5.7 Hazards and Hazardous Materials, City of Riverside's Emergency Operations Plan, Riverside Multi-Jurisdictional LHMP, Hunter Business Park Specific Plan)					
No Impact. Project implementation would not alter or otherwise interfere with public rights-of-way and, therefore, would not interfere with an emergency response or evacuation plan. The project would be required to comply with applicable California Fire Code (Title 24, California Code of Regulations, Section 9) requirements. Therefore, the project would have no impact on existing City-wide emergency response or evacuation plans. No mitigation is required.					
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			\boxtimes		
8h. Response (Source: GP 2025 Figure PS-7 Fire Hazard	Areas, CalF	TIRE VHFH	SZ in LRA	for Western	

Specific Plan)

Less Than Significant Impact. The project site is adjacent to Box Springs Mountain Reserve Park, which is in a Very High

Riverside 2010, City of Riverside's EOP, Riverside Multi-Jurisdictional LHMP, Hunter Business Park

Fire Severity Zone (VHFSZ) under County responsibility, and is also noted as such in Figure PS-7 of the GP 2025. The project site itself is also located in the VHFSZ. The project site plans indicate the provision of required access roads around the proposed structures to meet the minimum roadway widths stated in Title 18 (Subdivision) of the RMC and the City's Fire Code Section 503 (California Fire Code 2007). The project site plan indicates clearance around the proposed structures, comprised of parking spaces with minimal vegetation. The project also includes the development of a ten-foot-wide multiuse trail, made of decomposed granite material as specified by City of Riverside Parks and Recreation Department, which will run along the southern and eastern sides of the project. As the trail is needed for fire protection, the trail will provide a 12-foot clearance for fire service vehicles and will be designed to keep the maximum slope no greater than 15 percent. With implementation of GP 2025 policies, compliance with existing codes and standards, and adherence to Riverside Fire Department (RFD) practices, the project would have a **less than significant impact** related to wildland fires. No mitigation is required.

9. HYDROLOGY AND WATER QUALITY			
Would the project:			
a. Violate any water quality standards or waste discharge requirements?			
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			
d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?			
e. Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			
f. Would the project otherwise substantially degrade water quality?		\boxtimes	

9a, c-f. Response (Source: GP 2025 FPEIR Section 5.8 Hydrology and Water Quality, GP 2025 FPEIR Table 5.8-A Beneficial Uses Receiving Water, Hydrologic Analysis [Rick Engineering June 2017a], Water Quality Management Plan [Rick Engineering June 2017c])

Less Than Significant Impact. The project site is located within the Santa Ana River Watershed. Surface drainage in the Santa Ana River Watershed generally flows in a northerly direction into the Santa Ana River and to the Pacific Ocean. A hydrologic analysis was completed by Rick Engineering (Rick Engineering 2017a). There are no detention requirements for the project site. Water from the entire site currently enters into the existing Riverside County Flood Control 36-inch storm drain on Marlborough Avenue. Therefore, the project would maintain the existing overall drainage pattern while collecting all run-on and diverting flows around the proposed building before ultimately connecting to the existing storm drain, before ultimately conveying flows to Lake Evans. Flow analysis concluded that the project would be able to discharge into the existing pipe without needing to increase the capacity of the existing storm drain.

The project would entail site grading and compaction, pouring of concrete and asphalt, and construction of a single structure. The project site clearing and grading phases would disturb any existing vegetation and surface soils, which may cause minor erosion and sedimentation. Since the proposed project would entail ground disturbance activities greater than one acre in area, the project would be subject to National Pollution Discharge Elimination System (NPDES) requirements, administered by the Santa Ana Regional Water Quality Control Board (RWQCB). In accordance with provisions for construction site inspections and new development per the NPDES applicable to the City (Order No. R8-2010-0033, NPDES No. CAS 618033), any contaminated water would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Per the NPDES permit, the project must implement a Storm Water Pollution Prevention Plan (SWPPP). Implementation of site-specific best management practices (BMPs) as established by the SWPPP, such as site watering, would limit impacts related to erosion and sedimentation from ground disturbance.

Furthermore, the project would also comply with RMC Title 16 (Buildings and Construction) and Title 17 (Grading), which requires a Notice of Intent submittal to the State Water Board prior to issuance of a grading permit, and development and implementation of a SWPPP concurrent with the commencement of clearing and grading activities. Given compliance with

all applicable local, state, and federal laws regulating surface water result in significant impacts to any water quality standards or w significant impacts related to water quality, erosion, flooding, and ru	aste discharge	e, the project	would result			
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?						
9b. Response (Source: GP 2025 Table PF-1 Riverside Publi FT/YR), Table PF-2 RPU Projected Water Demand, Table I Domestic Water Supply (AC-FT/YR), RPU 2015 Urban Water	PF-3 Western	n Municipal				
Less Than Significant Impact. The project site is located within t indicate paved parking areas around the building, with pervious sureast of the site. According to the hydrologic analysis conducted for the existing storm drain pipe on Marlborough Avenue (Rick Engineer)	faces maintain the project, the	ed in the slop	ed area to the	northeast and		
Domestic water demand in the City is expected to increase from 91,048 acre-feet per year in 2015 to 99,835 acre-feet per year in 2025 in normal water years, and Riverside Public Utilities (RPU) anticipates a water supply of 112,671 acre-feet per year in the year 2025 with a projected water surplus of approximately 12,836 acre-feet per year under a Typical Growth Scenario. During single dry year conditions, supply is expected to exceed demand by 4,754 acre-feet in 2025, and under multiple dry year conditions, supply is expected to exceed demand by 10,830 acre-feet in 2025. According to the GP 2025 and the GP 2025 FPEIR, safe yield will be maintained in RPU's groundwater basins and development under the GP 2025 would have impacts that are considered less than significant.						
The proposed land uses would be consistent with the GP 2025 and zoning ordinance, and would not induce population growth above that which is forecast for the City since there are no dwelling units that would be built as part of the project. The project would remain consistent with the typical growth scenario expected under the GP 2025, where future water supply was determined to be adequate.						
The project would incorporate design features that utilize water conservation such as low-flush toilets and low-flow faucets in compliance with the California Green Building Standards, and drought-tolerant landscaping in compliance with the City's Water Efficient Landscape Ordinance (RMC Section 19.570). Furthermore, the project would be required to comply with all NPDES requirements, which would further ensure the project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the project would have a less than significant impact to groundwater supplies and recharge. No mitigation is required.						
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?						
9g. Response (Source: GP 2025 Figure PS-4 Flood Hazard Areas, and FEMA Flood Hazard Maps No. 06065C0727G)						
No Impact. A review of the Federal Emergency Management Age 06065C0727G, effective date August 28, 2008) and Figure 5.8-2 Floroject site is not located within or near a 100-year flood hazard residential dwellings. Therefore, the project would not place a reswould impede or redirect flood waters, and the project would have n ear the project would have n	od Hazard Ard larea. The pidential struct	eas of the GP : roposed build ure in a 100-	2025 FPEIR, s ing would no year flood haz	shows that the tinclude any		
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				\boxtimes		

¹ 112,761 acre-feet/year (anticipated 2025 supply) – 99,835 acre-feet/year (anticipated 2025 demand) = 12,836 acre-feet/year (anticipated 2025 surplus)

96065C0727G)	ra Areas, ai	IA FENIA F	100a Hazare	i Maps No.
No Impact. A review of the FEMA Flood Insurance Rate Map (No. 2008) and Figure 5.8-2 Flood Hazard Areas of the GP 2025 FPEIR, standard flood hazard area. Therefore, the proposed building would would impede or redirect flood waters, and the project would have no. 100 months are the	shows that the not be constru	project site is acted in a 100	not located wi	ithin or near a
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				
9i. Response (Source: GP 2025 Figure PS-4 Flood Hazard Hazard Areas, and FEMA Flood Hazard Maps No. 06065C0		P 2025 FPI	EIR Figure	5.8-2 Flood
No Impact. The project site is not located in or near a flood hazard and the FEMA Flood Insurance Rate Map. The project site is not loc Figure 5.8-2. Therefore, the project would not place a structure wite expose people or structures to a significant risk of loss, injury or deather failure of a levee or dam. The project would have no impact . No	cated in an are thin a flood ha th involving f	a subject to da azard or dam looding, inclu	am inundation inundation are	according to ea that would
j. Inundation by seiche, tsunami, or mudflow?				\boxtimes
9j. Response (<i>Source: GP 2025 FPEIR Chapter 5.8 Hydrolog</i> No Impact. Tsunamis are large waves that occur in coastal areas. The nearly 65 miles east of the coastline. The project site has relatively Springs Mountain Reserve park to the northeast and east of the project vicinity of the project site; the Santa Ana River is approximately 3.25 from inundation by seiche, tsunami, or mudflow is expected to occur	the City is not I flat topographect site. There 25 miles west	ocated in a co hy, though ad are no bodie of the project	jacent to the s s of water in t site. Therefor	slopes of Box he immediate re, no impact
10. LAND USE AND PLANNING				
Would the project:				
a. Physically divide an established community?				\boxtimes
10a. Response (Source: GP 2025 Land Use and Urban Desig Project Site Plan)	gn Element,	Hunter Busi	ness Park S _I	pecific Plan,
No Impact. The proposed project involves construction of a 3-approximately 339,510 square feet of unrefrigerated warehouse approximately 22.34 gross-acre site. The project would include 86,69 vehicular parking spaces, eight ADA parking spaces, and 12 trailer Park area. The project would not include new roads off-site and we project would be compatible with surrounding land uses, which condivide an established community. Therefore, the project would have a	space and 6,598 square feet parking space ould be limited nist of office	320 square for of surface parts, on an infill I to the bound and light ind	eet of office rking lot, with site in the Hu lary of the pro- ustrial uses, a	space, on an 364 standard nter Business ject site. The
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
10b. Response (Source: GP 2025 Figure LU-7 Redevelopm Map, Table LU-5 Zoning/General Plan Consistency Matrix, I				

Less Than Significant Impact. The project site has a GP 2025 land use designation of Business/Office Park (B/OP) and is zoned BMP-SP - Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones. The project site is located in the Industrial Park District of the Hunter Business Park Specific Plan. The proposed building would be used for warehouse operations with associated office space, consistent with the General Plan, zoning regulations and the Hunter Business Park Specific Plan. The project would be similar to and compatible with existing surrounding land uses to the west and north, which are office and light industrial uses. Therefore, the project would fully integrate with the established light industrial uses surrounding the project site. The tables below compare the project to applicable policies of the three policy documents.

Table 9 General Plan 2025 Consistency Analysis

GP 2025 Policies	Analysis
Land Use and Urban Design Element	
Policy LU-4.2. Enforce the hillside grading provisions of the City's Grading Code (Title 17) to minimize ground disturbance associated with hillside development; respect existing land contours to maximum feasible extent.	Consistent with Issuance of a Grading Exception. According to project site plans, retaining walls would be installed in select areas along the perimeter of paved areas to preserve Gage Canal (along the western boundary of the site) and the northwestern foothill of Box Springs Mountain Reserve (along the eastern boundary of the site). The installation of such retaining walls limits the extent of development that can occur on the site and ensures proper buffering from hillsides and existing contours. However, due to project design features, the retaining walls would not minimize ground disturbance or follow existing land contours as intended by Policy LU-4.2 and the City's Hillside Grading Ordinance. Therefore, the proposed project includes a request for a Grading Exception to allow for a variance to this policy. The requested Grading Exception would need to be obtained in conjunction with the other project permits in order for the project to be consistent with Policy LU-4.2.
Policy LU-7.2. Design new development adjacent and in close proximity to native wildlife in a manner which protects and preserves habitat.	Consistent. Retaining walls would be placed along the eastern boundary of paved areas on site, adjacent to the northwestern foothill of Box Springs Mountain Reserve to prevent development from encroaching on wildlife habitat and ensure proper buffering. The existing drainage pattern would be preserved such that runoff is captured in a basin on the southwest corner of the site before being conveyed to existing drains along Marlborough Avenue.
Circulation and Community Mobility Element	
Policy CCM-13.1. Ensure that new development provides adequate parking.	Consistent. The project would include 372 standard vehicular parking spaces and 12 trailer parking spaces. Per RMC Section 19.580.060, the project is required to provide 1 space/1,000 square feet of warehouse floor area plus 1 space/250 square feet of office area. The project would be required to provide 340 spaces for the warehouse and 28 spaces for the associated offices, for a total of 368 spaces. The project would provide 7 standard parking spaces beyond the requirement. The development would provide adequate parking.
Noise Element	
Policy N-2.1. Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Figure N-10 Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the RCALUCPs) as guides to future planning and development decisions.	Consistent. The noise study completed for the proposed project demonstrated that operational noise would be within acceptable noise standards, with the exception of night-time operations of the facility. In order to ensure noise impacts would be less than significant, the project would implement mitigation measures NOI-1 through 4 (further discussed in Section 12, <i>Noise</i>).
	The nearest airport to the project site is Flabob Airport, located 4.5 miles west. March Air Reserve Base/Inland Port Airport is located approximately 7 miles southeast. The project site is within the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan Zone E. Noise Impacts in Zone E are "Low" with occasional overflights being intrusive to some outdoor activities. The project was reviewed by the Airport Land Use Commission on July 13, 2017 and was found to be consistent with the Airport Land Use Compatibility Plan.

Open Space and Conservation Element	
Policy OS-8.2. Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in existing developments.	Consistent. The proposed building would incorporate CBC Title 24 measures, and also include large fans for indoor air handling and temperature control.
Policy OS-8.5. Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24.	
Public Facilities and Infrastructure Element	
Policy PF-1.3. Continue to require that new development fund fair-share costs associated with the provision of water service.	Consistent. The project applicant would be required to pay water service connection fees, determined by the City's Building and Safety Division and Public Utilities Division.
Policy PF-3.2. Continue to require that new development fund fair-share costs associated with the provision of wastewater service.	Consistent. The project applicant would be required to pay sewer connection fees, determined according to RMC Section 14.08.080.
Parks and Recreation Element	
Policy PR-2.3. Improve and create more connections and increase the safety of the bicycling, equestrian, and pedestrian trail system within the City.	Consistent. Site plans indicate the preservation and enhancement of an existing trail connection that starts along Gage Canal at the southwest corner of the project site and runs along the southern and eastern boundary of the site, which is part of the Sugarloaf Trails of the Box Springs Mountain Reserve. The trail would remain publicly accessible for bicycling and hiking. The trail will provide a 12-foot clearance for fire service vehicles and will be designed to keep the maximum slope no greater than 15 percent. Warehouse employees may also access the trail during midday breaks.

The project site is located in the Hunter Business Park Specific Plan area. The table below compares the project to applicable development standards and design guidelines included in the Hunter Business Park Specific Plan.

Table 10 Hunter Business Park Specific Plan Consistency Analysis

Development Standards	Minimum/ Maximum	Project	Consistent
Lot Standards			
Lot Area	5 acres min	Approx. 22.34 gross-acres	
Lot Width	300 ft min	Approx. 650 ft.	Yes
Site Coverage	50 percent max	47.5 percent	Yes
Building Height	45 ft max.	42 feet max.	Yes
Setbacks	20 ft min, side and rear	149 ft. min. from eastern lot line 119 ft. min. from western lot line 115 ft. min. from southern lot lines	Yes
Access			
One access point per 300 feet of frontage	Primary access from Marlborough Drive Secondary access from Research Park Drive		Yes
Parking (RMC Section 19.580.060)			
Warehousing and Wholesale Distribution Centers 1 space per 1,000 SF floor area, plus 1 space per 250 SF office area	340 (339,510 SF / 1,000 SF) + 28 (6,820 SF/250 SF) Total Required: 368 spaces	379 stalls (375 regular stalls, 4 ADA stalls), plus 12 trailer spaces	Yes

The project site is located in the BMP zone. The table below compares the project to standards for BMP zones, per RMC Section 19.130.030.

Table 11 Riverside Municipal Code Zoning Consistency Analysis

Development Standards	Minimum/ Maximum	Project	Consistent
Floor-Area-Ratio	1.5 max.	Approx. 0.5	Yes
Lot Area	40,000 sf min.	979,904 SF (gross) 729,243 SF (net)	Yes
Lot Width	140 ft min.	Approx. 650 ft.	Yes
Lot Depth	100 ft min.	Approx. 1,300 ft	Yes
Building Height	45 ft max.	42 feet max.	Yes
Front Yard Setback Buildings over 30 ft in height Along an arterial street	50 ft min. ¹ 40 ft min. ²	65 ft. min. from northern lot line	Yes
Side Yard Setbacks: Interior Side Adjacent to Street or Alley	0 ft min. 0 ft min.	149 ft. min. from eastern lot line 119 ft. min. from western lot line	Yes
Rear yard Setback Adjacent to Streets Same as Front Yard	0 ft min. 40 ft min.	115 ft. min. from southern lot lines	Yes

Source: adapted from Table 19.130.030(A) of the RMC Chapter 19.130.

Based on the analyses provided above, the project would be consistent with all applicable GP 2025 policies, and development standards and guidelines in the Hunter Business Park Specific Plan and for the BMP zone. Therefore, the project would have **less than significant impact**. No mitigation is required.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?		\boxtimes		
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10c. Response (Source: GP 2025 Figure LU-7 Redevelopment Areas Map, Figure LU-10 Land Use Policy Map, Table LU-5 Zoning/General Plan Consistency Matrix, Figure OS-6 SKR-HCP, Figure OS-7 MSHCP Cores and Linkages, Figure OS-8 MSHCP Cell Areas, GP 2025 FPEIR Figure 5.4-2 MSHCP Area Plans, Figure 5.4-4 MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 MSHCP Criteria Area Species Survey Area, Figure 5.4-8 MSHCP Burrowing Owl Survey Area, Hunter Business Park Specific Plan)

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 4, *Biological Resources* above, the project is consistent with the SKR-HCP (Stephens' Kangaroo Rat - Habitat Conservation Plan) and with GP 2025 Policy OS-5.3. The project would be mostly consistent with the guidelines of the MSHCP, including Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlife Interface) and related policies in the GP 2025, including Policy LU-7.4. However, as further discussed in Section 1, *Aesthetics*, and Section 12, *Noise*, several mitigation measures would be implemented to ensure new sources of light and temporary construction noise and operational noise would not significantly impact the surrounding natural open space area. Such measures include limiting glare from new light sources (AES-1), and reducing construction noise impacts (mitigation measures NOI-3 and NOI-4) by restricting hours for construction activities, implementing temporary sound attenuation barriers, and the use of mufflers on all equipment. Measures to reduce operational noise impacts (mitigation measures NOI-1 and NOI-2) include restricted operations during nighttime hours and the installation of noise-attenuating barriers around any rooftop mechanical equipment. Therefore, the project would have a less than significant impact with mitigation incorporated associated with potential inconsistencies with the MSHCP and/or SKR-HCP to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

¹ In the BMP Zone, 20-feet of the required 50-foot front yard setback shall be landscaped.

² A 40-foot front yard setback shall be permitted if it is landscaped in its entirety.

11. MINERAL RESOURCES				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
11a. Response (Source: GP 2025 Figure OS-1 Mineral Resou	urces)			
No Impact. The project would not involve extraction of mineral Conservation, Division of Mines and Geology, the project site is denotes areas that contain mineral deposits whose significance ca provides no specific policies regarding property identified as MRZ resource related uses. Additionally, there is no historical use of the s Therefore, the project would have no impact on mineral resources required.	designated Minnot be evaluated and has not be items. Items and has not be items.	ineral Resource nated from avoid designated ding area for r	the Project site of the pr	RZ-3), which The GP 2025 te for mineral tion purposes.
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				\boxtimes

11b. Response (Source: GP 2025 Figure OS-1 Mineral Resources)

No Impact. As discussed in Response 11a above, the proposed project is in a zone with a classification of MRZ-3. The General Plan indicates that quarrying of mineral resources no longer plays a major role in the City's economy, with the exception of the areas classifies as MRZ-2 zones, between Market Street and Mission Boulevard between the Santa Ana River and Lake Evans, as shown in the City of Riverside General Plan Figure OS-1. The project is consistent with the GP 2025. Therefore, there is **no impact**. No mitigation is required.

12. NOISE			
Would the project result in:			
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		\boxtimes	

12a. Response (Source: GP 2025 Figure N-1 2003 Roadway Noise, Figure N-2 2003 Freeway Noise, Figure N-5 2025 Roadway Noise, Figure N-6 2025 Freeway Noise, Figure N-9 March ARB Noise Contours, Figure N-10 Noise/Land Use Noise Compatibility Criteria, GP 2025 FPEIR Table 5.11-I Existing and Future Noise Contour Comparison, Table 5.11-E Interior and Exterior Noise Standards, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Riverside Municipal Code Title 7 Noise Code, Noise Study [Rincon Consultants 2017e])

Less Than Significant Impact. Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Because of the way the human ear works, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance, while noise from a point source typically attenuates at about 6 dBA per doubling of distance. Noise levels may also be reduced by the introduction of intervening structures. For example, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm that breaks the line-of-sight reduces noise levels by 5 to 10 dBA. The construction style for new buildings in California generally provides a reduction of exterior-to-interior noise levels of about 30 dBA with closed windows (Federal Highway Administration [FHWA] 2017).

The Noise Element of the Riverside General Plan (2007) identifies sources of noise and provides objectives and policies

designed to incorporate noise control in the planning process. To ensure different land uses are developed in compatible noise environments, the City's Noise Element establishes noise guidelines for land use planning, shown in Table 12. The Noise Element requires protection of sensitive receptors from excessive noise associated with commercial and industrial businesses and agricultural activities. During the preliminary stage of the development process, potential noise impacts and appropriate mitigation are to be identified.

The Noise Element includes specific policies to reduce noise that apply to new development:

- Policy N-1.3. Enforce that the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences, and special events are minimalized.
- Policy N-1.4. Incorporate noise considerations into the site plan review process, particularly with regard to parking
 and loading areas, ingress/egress points and refuse collection areas.
- Policy N-1.5. Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas.
- Policy N-1.8. Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects

Table 12 Noise/Land Use Noise Compatibility Criteria

	Community Noise Equivalent Level (CNEL) or Day-Night Level (Ldn), dBA			
Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Conditionally Unacceptable
Single Family Residential	60	65	70	90
Infill Single Family Residential	65	75	80	90
Commercial (Motels, Hotels, Lodging)	60	70	80	90
Schools, Libraries, Churches, Hospitals, Nursing Homes	60	70	80	90
Amphitheaters, Concert Hall, Auditorium, Meeting Hall	N/A	65	N/A	90
Sports Arenas, Outdoor Spectator Sports	N/A	70	N/A	90
Playgrounds, Neighborhood Parks	70	N/A	75	90
Golf Courses, Riding Stables, Water Rec, Cemeteries	70	N/A	80	90
Office Buildings, Business, Commercial, Professional	65	75	90	N/A
Industrial, Manufacturing, Utilities, Agriculture	70	80	90	N/A
Freeway Adjacent Commercial, Office, and Industrial Uses	65	80	90	N/A

Source: Riverside General Plan 2025 (adopted 2007)

The City of Riverside Municipal Code sets forth the City's standards, guidelines, and procedures concerning the regulation of operational noise. Specifically, Title 7, Noise Control, of the Code regulates noise levels in the City. These regulations are intended to implement the goals, objectives, and policies of the General Plan, protect the public health, safety, and welfare of the City, and to control unnecessary, excessive, and/or annoying noise in the City.

Section 7.25.010 of the Municipal Code establishes exterior noise standards for various land use categories over certain periods of time. Per the Municipal Code, noise from operations at any land use cannot exceed the exterior noise limit of another land use, as measured at the property line. City exterior noise standards are shown in Table 13.

Table 13 City of Riverside Exterior Noise Standards

Land Use Category	Time Period	Noise Level
Residential	Night (10 PM to 7 AM)	45 dBA
- Testdential	Day (7 AM to 10 PM)	55 dBA
Office/Commercial	Anytime	65 dBA

Industrial	Anytime	70 dBA		
Community Support	Anytime	60 dBA		
Public Recreation Facility	Anytime	65 dBA		
Nonurban	Anytime	70 dBA		
Source: City of Riverside Municipal Code, Table 7.25.010A				

Furthermore, any noise exceeding the following is prohibited:

- The exterior noise standard of the applicable land use category, plus up to five decibels, for a cumulative period of more than thirty minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus five decibels for a cumulative period of more than fifteen minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus ten decibels, for a cumulative period of more than five minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus fifteen decibels, for a cumulative period of more than one minute in any hour; or
- The exterior noise standard for the applicable land use category, plus twenty decibels or the maximum measured ambient noise level, for any period of time.

Per Implementation Tool N-1 of the GP 2025 Noise Element, this project has been reviewed to ensure that noise standards and compatibility issues have been addressed. A noise study was prepared for the project by Rincon Consultants in December 2017. The noise study concluded that the project meets the City's noise standards as set forth in Title 7 of the Municipal Code, and is compliant with the Noise/Land Use Noise Compatibility Criteria Matrix (Figure N-10) of the Noise Element for exposure of people to noise. Therefore, the project would have a **less than significant impact** on the exposure of persons to or the generation of noise levels in excess of established City standards. No mitigation is required.

However, though not included in the Riverside GP 2025 Noise Element as a noise sensitive receptor, Box Springs Mountain Reserve Park is considered a sensitive receptor pursuant to the Western Riverside County MSHCP. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. The southern and eastern boundaries of the project site are abutting the northern side of the Box Springs Mountain Reserve Park hills, which act as a natural buffer to the rest of the reserve area. Proposed noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms, or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. Potential impacts to Box Springs Mountain Reserve Park are discussed in Section 12c below.

b. Exposure of persons to or generation of excessive groundborne		\square	
vibration or groundborne noise levels?			

12b. Response (Source: GP 2025 Figure N-1 2003 Roadway Noise, Figure N-2 2003 Freeway Noise, Figure N-5 2025 Roadway Noise, Figure N-6 2025 Freeway Noise, Figure N-9 March ARB Noise Contours, GP 2025 FPEIR Table 5.11-G Vibration Source Levels For Construction Equipment, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Noise Study [Rincon Consultants 2017e])

Less Than Significant Impact. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S. The City has not adopted any thresholds or regulations addressing vibration. The vibration velocity level threshold of perception for humans is approximately 65 VdB.

The Federal Railroad Administration (FRA) provides the following thresholds for assessing ground-borne vibration impacts:

- 65 VdB where low ambient vibration is essential for interior operations, such as hospitals and recording studios
- 72 VdB for residences and buildings where people normally sleep, including hotels
- 75 VdB for institutional land uses with primary daytime use, such as churches and schools
- 95 VdB for physical damage to extremely fragile historic buildings
- 100 VdB for physical damage to buildings

The City of Riverside has not adopted any thresholds for construction or operational groundborne vibration impacts. However, the California Department of Transportation (Caltrans) has set vibration criteria for various land uses, as shown in Table 14.

Table 14 Caltrans Vibration Impact Criteria

Land Use Category	Vibration Impact Level for Frequent Events (VdB) ¹	Vibration Impact Level for Infrequent Events (VdB) ²
Building where low ambient vibration is essential for interior operations	65	65
Residences and buildings where people normally sleep	72	80
Institutional land uses with primary daytime use	75	83

Source: Transportation and Construction Vibration Guidance Manual 2013, Caltrans

Construction-related activities, although short term, are the most common source of groundborne noise and vibration that could affect occupants present at neighboring existing buildings. The potential for noise and ground-borne vibration impacts related to noise land use compatibility, construction-related noise per GP 2025 FPEIR, Table 5.11-G, Vibration Source Levels for Construction Equipment, on-site stationary noise sources, and vehicular-related noise were analyzed in the noise study. The vibration velocity level threshold of perception for humans is approximately 65 VdB (Federal Transit Administration 2006). A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. The range of interest is from approximately 50 VdB to 100 VdB. 100 VdB is the threshold where minor damage to fragile buildings may occur. The general human response to different levels of groundborne vibration velocity levels is described below.

Table 15 Groundborne Vibration Velocity Levels

Vibration Velocity Level	Human Reaction		
65 VdB	Approximate threshold of perception for many people		
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people fine that transportation-related vibration at this level is unacceptable.		
Vibration acceptable only if there are an infrequent number of events per day.			
Source: Federal Transit Adminis	Source: Federal Transit Administration, 2006		

Vibration could exceed 85 VdB at adjacent industrial properties 25 feet to the east and north. However, such events would be intermittent and temporary, and vibration would not reach levels that could cause building damage (100 VdB). Moreover, the adjacent uses, which consist of office and light industrial uses, are not vibration sensitive. Groundborne vibration at the closest sensitive receptor, residences 2,500 feet south of the project site, would not exceed 65 VdB. The following table lists ground-borne vibration levels from various types of construction equipment.

Table 16 Groundborne Vibration Levels from Various Types of Construction Equipment

	Approximate VdB	Approximate VdB at Nearest Receptors			
Equipment	25 Feet	2,500 Feet			
Large Bulldozer	87	27			
Loaded Trucks	86	26			
Small Bulldozer	58	58 N/A			
Source: Federal Transit Ad	ministration 2006				

The noise study concluded the project to be in compliance with the Caltrans' vibration standards and found impacts related to groundborne vibration and groundborne noise levels as a result of the project to be a **less than significant** impact. No mitigation is required.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?		\boxtimes		
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12c. Response (Source: GP 2025 Figure N-1 2003 Roadway Noise, Figure N-2 2003 Freeway Noise, Figure

¹ Frequent events are defined as more than 70 events per day.

² Infrequent events are defined as fewer than 70 events per day.

N-5 2025 Roadway Noise, Figure N-6 2025 Freeway Noise, Figure N-9 March ARB Noise Contours, Figure N-10 Noise/Land Use Noise Compatibility Criteria, GP 2025 FPEIR Table 5.11-I Existing and Future Noise Contour Comparison, Table 5.11-E Interior and Exterior Noise Standards, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Riverside Municipal Code Title 7 Noise Code, Noise Study [Rincon Consultants 2017e], Traffic Impact Analysis [Rick Engineering 2017b])

Less Than Significant with Mitigation Incorporated. As discussed above, though not included in the Riverside General Plan 2025 Noise Element as a noise sensitive receptor, Box Springs Mountain Reserve Park is considered a sensitive receptor pursuant to the Western Riverside County MSHCP. The southern and eastern boundaries of the project site are abutting the northern side of the Box Springs Mountain Reserve Park hills. These hills act as a natural buffer to the rest of the reserve area. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards (MSHCP 2003). The portion of the Box Springs Mountain Reserve Park that is adjacent to the subject project does not provide picnicking or camping facilities, nor does it allow for nighttime access. The use of the Reserve by people would be limited to the hiking trail that traverses the southern and eastern property line. Noise impacts to people would be infrequent and limited in duration and therefore, would be less than significant. The discussion below focuses on potential wildlife noise exposure to a permanent increase in ambient noise levels.

A noise study was prepared by Rincon Consultants in November 2017 to determine whether the project would result in a permanent increase in ambient noise levels. Noise measurements, shown in the Table 17 below, were taken on May 4, 2017 during evening peak traffic hour to represent the ambient noise levels at the project site. Two additional noise measurements (5 and 6) were taken on August 16, 2017, adjacent to Box Springs Mountain Reserve Park and along Research Park Drive to estimate the ambient noise levels at both locations.

Table 17 Ambient Noise

#	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	Leq[15] (dBA) ¹
1	Onsite	4:18 PM – 4:33 PM	200 feet ²	50.7
2	Existing warehouse in vicinity (comparison)	6:06 PM – 6:21 PM	400 feet ³	51.3
3	Off-site as Hunter Park on Iowa Avenue	5:40 PM – 5:55 PM	30 feet ⁴	70.0
4	Off-site Residences on Columbia Avenue	4:50 PM – 5:05 PM	50 feet ⁵	73.0
5	Off-site Box Springs Mountain Reserve Park	6:30 – 6:45 AM	100 feet ⁶	49.4
6	Off-site on Research Park Drive	6:03 – 6:18 AM	50 feet ⁷	56.0

Source: Rincon Consultants 2017d, field measurements on May 4, 2017 (measurements 1-4) and August 16, 2017 (measurements 5-6) field using ANSI Type II Integrating sound level meter.

Daytime Operational Noise. The nearest noise inducing operational activity (accelerating from a stop) would be located a minimum 95 feet from the Reserve. The majority of operational activities (noise associated with loading/unloading activities) would take place 200 feet or more from the sensitive receptor. The proposed building would include 34 loading docks on the western side of the warehouse and 15 loading docks on the southern side of the warehouse. Noise from the western docks would be attenuated by the warehouse building itself and would not result in any impacts to the Box Springs Mountain Reserve Park. The southern and eastern boundaries of the project site are abutting the northern side of the Box Springs Mountain Reserve Park hills. The elevation of the hillside begins to climb while still on the subject property and would act as a natural buffer to the rest of the reserve area. Furthermore, the project would incorporate a 6- to 21-foot tall retaining wall along the eastern property boundary that would reduce the noise from the warehouse operations. Table 18 details the likely noise sources related to loading and unloading operations.

Table 18 Noise from Loading/Unloading Operations

¹ The equivalent noise level (Leq) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). For this measurement, the Leq was over a 15-minute period (Leq[15]).

²Approximate distance to Marlborough Avenue.

³Approximate distance to rooftop equipment noise.

⁴Distance to centerline of Iowa Avenue.

⁵Distance to centerline of Columbia Avenue.

⁶Distance to nearby warehouse (primary noise source).

⁷Distance to centerline of Research Park Drive.

Truck-Related Noise Source	Assumed Sound Level	Nearest Distance to Sensitive Receptor ¹	Assumed Sound Level at Sensitive Receptor	Potentially Exceeds Daytime Threshold of 55 dBA?	Potentially Exceeds Nighttime Threshold of 45 dBA?
Pass-by ²	68 dBA at 30 ft ³	240 ft	49.9 dBA	No	Yes
Airbrakes	72 dBA at 25 ft	200 ft	53.9 dBA	No	Yes
Backup Alarm	79 dBA at 30 ft	200 ft	62.5 dBA	Yes	Yes
Brief Idle before Engine Shutoff	70 dBA at 25 ft	200 ft	51.9 dBA	No	Yes
Engine Ignition + Airbrakes	71 dBA at 25 ft	200 ft	52.9 dBA	No	Yes
Accelerating from Stop	74 dBA at 25 ft	95 ft	62.4 dBA	Yes	Yes

Source: Adapted from Midpoint at 237, Loading Dock Noise Study. Charles M. Salter Associates, Inc. 2014.

It is assumed that each of the noise sources listed in Table 18 would be short in duration and would occur sporadically throughout the day and/or night. RMC Section 7.25.010 indicates noise levels may exceed the base standard in incremental amounts over shortening amounts of time each hour as follows:

- Up to five decibels for a cumulative period of up to 30 minutes in any hour; or
- Plus five decibels for a cumulative period of up to 15 minutes in any hour; or
- Plus 10 decibels for a cumulative period of up to five minutes in any hour; or
- Plus 15 decibels for a cumulative period of up to one minute in any hour; or
- No more than 20 decibels for any period of time.

Despite the proposed building setbacks and a 6- to 21-foot retaining wall along the eastern project boundary, daytime operational noise involving backup alarms and general acceleration of trucks on the south side of the building would still exceed base acceptable noise levels of 55 dBA at the adjacent Box Springs Reserve Park. However, the City noise ordinance allows noise of up to 10 dBA over the 55 dBA daytime residential standard for events lasting less than five cumulative minutes over one hour. It is presumed that backup alarms and acceleration of the trucks at the nearest points to the sensitive receptor would occur infrequently, would be cumulatively less than five minutes in duration in any given hour, and would therefore meet the standards of the City noise ordinance. No noise reducing measures would be necessary during daytime operation.

Nighttime Operational Noise. Nighttime operational noise from all anticipated noise sources would exceed acceptable noise levels of 45 dBA. It is worth noting that, as shown in Table 1, the existing onsite noise level is approximately 49.4 dBA or less before 7 AM, which means that the ambient nighttime noise level already exceeds the City's threshold of 45 dBA. However, City regulations allowing for an exceedance of noise level thresholds for specified amounts of time, apply the 45 dBA threshold, despite ambient noise levels, and therefore, ambient noise itself exceeds the allowed "Up to five decibels for a cumulative period of up to 30 minutes in any hour" as discussed in Section 2.2.2 and on the page above. In theory, any nighttime operation along the southern portion of the proposed building would produce noise at plus 5 decibels above threshold (50 to 55 dBA), limiting operations along the south-facing loading docks to no more than 15 minutes per hour (the allowed "Plus 5 decibels for a cumulative period of up to 15 minutes in any hour").

The noise produced from back up alarms and truck acceleration at locations nearest to Box Springs Mountain would produce noise at more than 20 decibels above threshold (60+ dBA), which is prohibited for any duration. Accelerating truck noise falls below maximum allowed noise levels (60 dBA) at 125 feet from the source. Back up alarms fall below maximum allowed noise levels (60 dBA) at 270 feet from the source. In order to reduce nighttime noise impacts to below maximum allowed noise levels, nighttime operations along the south-facing loading docks would have to be significantly limited, with only one or two of the westernmost south-facing bays in operation. In addition, the noise produced cumulatively from the back up alarms and truck acceleration would be limited to no more than one minute per hour ("Plus 15 decibels for a cumulative period of up to one minute in any hour"). Construction of a barrier (i.e. solid wall) to mitigate noise impacts would be infeasible due to the clearance required for truck movement which, in turn, would place the barrier too far from the noise source to effectively capture the impact. Therefore, in order to avoid potential nighttime noise impacts to wildlife in the Box Springs Mountain Reserve Park, mitigation measure NOI-1 would be implemented to reduce potential noise impacts to less than significant with mitigation incorporated.

¹ Box Springs Mountain Reserve Park

² Arrivals and departures

 $^{3 \}text{ ft} = \text{feet}$

MM NOI-1: Restricted Loading Dock Use. Prohibit the use of the south-facing loading docks between the hours of 10 PM and 7 AM.

Rooftop Mounted Equipment. Rooftop ventilation and heating systems would result in some onsite noise. Noise levels from commercial heating, ventilation and air conditioning (HVAC) equipment can reach 100 dBA at a distance of three feet without shielding (EPA 1971). However, HVAC equipment typically includes noise shielding cabinets placed on the roof or is located within mechanical equipment rooms. If HVAC equipment is placed in the interior of the building the noise would not be perceptible to nearby noise sensitive receptors.

The nearest portion of the proposed rooftop is approximately 100 feet west of Box Springs Mountain Reserve Park. Conservatively assuming the HVAC equipment is placed on this portion of the roof, noise from HVAC equipment would be approximately 56.5 dBA Leq at 100 feet from the source (EPA 1971). Therefore, unshielded HVAC equipment could exceed noise level standards at Box Springs Mountain Reserve Park for both daytime standards (55 dBA) and nighttime standards (45 dBA). As designed however, it is assumed that rooftop HVAC equipment would be placed above the office portion of the building, nearly 600 feet west of Box Springs Mountain Reserve Park. Noise from this location would be 40.9 dBA, well below thresholds. Since the ultimate location of rooftop equipment is undetermined at this time, mitigation measure NOI-2 would be implemented to reduce potential noise impacts to nearby sensitive receptors to less than significant with mitigation incorporated.

MM NOI-2: Rooftop Mechanical Equipment Shielding. A noise-attenuating barrier shall be installed around any new rooftop mechanical equipment to reduce operational noise at Box Springs Mountain Reserve Park to equal to or less than pre-project ambient noise of 49.4 dBA.

Trash and Delivery Trucks. Operation of the project would include delivery and trash hauling trucks going to and from the project site. The California Motor Vehicle Code establishes maximum sound levels for trucks operating at speeds less than 35 miles per hour (Section 23130) of 86 dBA Leq at 50 feet, equivalent to 92 dBA Leq at 25 feet. However, maximum noise levels generated by passage of medium duty delivery trucks generally range from 61 to 70 dBA Leq at a distance of 25 feet, depending on the speed at which the truck is driving (Olson 1972). The minimum distance between the assumed delivery and trash truck routes and delivery points (i.e. office entrances) and the adjacent sensitive receptor would be 75 feet. Therefore, noise from delivery and trash truck movement through the site would be a maximum of 65 dBA. The adjacent Box Springs Mountain Reserve Park restricts noise impacts to no more than 55 dBA during daytime hours when delivery and trash trucks would be in operation. The City noise ordinance allows noise of up 10 dBA over the 65 dBA commercial standard for events lasting less than five cumulative minutes over one hour. It is presumed that deliveries and trash hauling activities would occur infrequently, would be cumulatively less than five minutes in duration in any given hour, and would therefore meet the standards of the City noise ordinance. There would be less than significant impacts related to trash and delivery trucks

Off-Site Traffic Noise. A doubling of sound energy is equivalent to an increase of 3 dBA. In general, a 3 dBA change in the ambient noise level is noticeable, while 1-2 dBA changes generally are not perceived. Areas adjacent to arterial streets are typically in the 50-60+ dBA range. As indicated in Table 17 above, noise measurements from Locations 3, 4, and 6 were collected from off-site locations, along Iowa Avenue, Columbia Avenue, and Research Park Drive, respectively, in order to establish ambient noise levels from traffic.

In order to determine potential changes in noise levels based on project trip generation, the Traffic Impact Analysis prepared by Rick Engineering (Rick Engineering 2017b) was reviewed. The proposed project would generate approximately 1,468 total daily trips. This analysis assumes that a majority of project trips would access and leave the site via Marlborough Avenue (approximately 1,100 trips), with the remaining trips accessing and leaving the site via Research Park Drive (approximately 370 trips). The daily trip increase has been calculated for Columbia Avenue because nearly 70 percent of the project-generated trips ultimately utilize the route to access Interstate 215 and briefly pass through a residential neighborhood. Trips along Iowa Avenue were analyzed because the road passes by Hunter Park. In addition, traffic increases along Research Park Drive were analyzed since that route is adjacent to Box Springs Mountain Reserve Park.

Based on the Traffic Impact Analysis review of existing plus cumulative plus project conditions, there will be an estimated 24,300 trips on Iowa Avenue, 25,880 on Columbia Avenue, and 2,355 trips on Research Park Drive (Rick Engineering 2017b). Table 19 shows project trip generation in relation to future cumulative conditions.

Table 19 Project Trip Generation in Relation to Future Cumulative Conditions

Road Segment	Future Cumulative Conditions	Net Trips Generated by Project	Percent Change in Trips, Associated with the Project	Change in dBA
Columbia Avenue	25.880	1.013	4%	0.4

Iowa Avenue	24,300	749	3%	0.4	
Research Park Drive	2,355	367	20%	0.8	
Source: Rick Engineering 2017b.					

The traffic volume increase of four percent along Columbia Avenue and the increase of three percent along Iowa Avenue would increase the overall noise level on those streets by 0.4 dBA, and the increase of 20 percent along Research Business Park would increase the overall noise level by 0.8 dBA. These noise level increases resulting from the increase based on project traffic would be below a perceivable increase in noise levels. There would not be a noticeable increase in traffic noise along these routes and therefore, the impacts to sensitive receptors related to increased traffic noise levels would be **less than significant**.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			\boxtimes		
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12d. Response (Source: GP 2025 FPEIR Table 5.11-J Construction Equipment Noise Levels, GP 2025 FPEIR Appendix G Noise Existing Conditions Report, Noise Study [Rincon Consultants 2017e])

Less Than Significant Impact. Construction of a warehouse would generate temporary noise that exceeds existing ambient noise levels in the project site vicinity, but would cease upon project completion. Noise impacts associated with construction activity are a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Table 20 shows typical peak noise levels associated with various types of heavy construction equipment expected during each construction phase along with their noise levels at 25 feet, representing the distance to adjacent industrial and open space uses. While noise levels would increase at adjacent business properties, industrial uses are not generally considered sensitive. Additionally, RMC Section 7.35.020.G exempts noise associated with construction. However, the increase in noise levels from construction would affect Box Springs Mountain Reserve Park.

Table 20 Typical Noise Levels Generated by Construction Equipment

Equipment	Туре	Typical Lmax (dBA) 25 feet from the source
Air Compressor	Stationary	87
Backhoe	Mobile	86
Concrete Mixer	Stationary	91
Dozer	Mobile	88
Front End Loader	Mobile	85
Grader	Mobile	89
Paver	Mobile	95
Roller	Mobile	86
Saw	Stationary	76
Scraper	Mobile	95
Source: FHWA 2006	,	

As shown in the Table 21, operation of equipment during various phases of construction could generate Leqs of approximately 40-51 dBA and maximum (Lmax) noise levels of approximately 44-56 dBA at the closest residences located 2,500 feet south of project site. Noise levels generated by construction could generate Leqs of approximately 80-91 dBA and Lmax noise levels of approximately 84-96 dBA at the nearest sensitive receptor, Box Springs Mountain Reserve Park, located along the southern border of the site. These estimates do not take into account the adjacent ridgeline or intervening structures that would block noise from construction. Therefore, these estimates are conservative. Equipment noise levels are based on a standard noise attenuation rate of 6 dBA per doubling of distance from the highest-volume individual pieces of equipment.

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Table 21 Construction Equipment Noise

		Estimated Noise at:						
Phase	Equipment	25 feet (dBA Lmax)	25 feet (dBA Leq)	2,500 feet (dBA Lmax)	2,500 feet (dBA Leq)			
Site Preparation	Grader, Loader, Backhoe, Scraper	91	90	51	50			
Grading	Saw, Dozer, Loader, Backhoe	96	91	56	51			
Building Construction	Crane, Forklift, Loader, Backhoe	87	85	47	45			
Architectural Coating	Air Compressor	84	80	44	40			
Paving	Concrete and Mortar Mixers, Paver, Roller, Loader, Backhoe	87	88	47	48			

Source: See Appendix B of the Noise Study for equipment noise impact data sheets and assumptions.

As noted above, the City of RMC Section 7.35.010 restricts construction to between the hours of 7:00 AM and 7:00 PM on weekdays and 8:00 AM and 5:00 PM on Saturdays, and prohibits construction on Sundays and federal holidays. Construction noise could exceed acceptable noise levels of 55 dBA during the day and 45 dBA at night at the adjacent Box Springs Mountain Reserve Park. However, noise sources associated with permitted construction, repair, remodeling, or grading activities that comply with the Municipal Code construction hour restrictions are exempt from these noise standards pursuant to RMC Section 7.35.020.G. Regardless, in order to reduce construction noise at the nearby Reserve Park, mitigation measure NOI-3 would be implemented to reduce potential noise impacts to nearby sensitive receptors to less than significant with mitigation incorporated.

MM NOI-3: Construction Management Plan. Prior to the issuance of grading permits, the applicant shall submit a Construction Management Plan satisfactory to the City of Riverside. The Building Official, or appropriately assigned City staff member, shall be responsible for enforcing noise attenuating construction requirements. The Construction Management Plan shall include, but not be limited to, the following:

- Excavation, grading, and other construction activities. These activities shall be restricted to the hours allowed under RMC Section 7.35.010. Any deviations from these standards shall comply with the provisions in Title 7 (Noise Control).
- Staging Area. Provide staging areas on-site to minimize off-site transportation of heavy construction equipment. These areas shall be located to maximize the distance between activity and sensitive receptors. This should reduce noise levels associated with most types of idling construction equipment.
- Avoid Operating Equipment Simultaneously. Whenever possible, ensure that construction activities are scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- Inspections. The contractor shall inspect construction equipment to ensure that such equipment is in proper operating condition and fitted with standard factory silencing features. Construction equipment shall utilize all standard factory silencing features, such as equipment mufflers, enclosures, and barriers.

MM NOI-4: Construction Noise Reduction. The following measures shall be followed during construction of the proposed project and associated site improvements:

- Newest Power Construction Equipment. The newest available power construction equipment with standard recommended noise shielding and muffling devices shall be used.
- *Mufflers*. During project grading and construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. Use of manufacturer-certified mufflers associated with construction equipment has been shown to reduce noise levels by 8 to 10 dBA.
- Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively,

back-up alarms should be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving the reverse direction.

• *Idling*. All construction vehicles, such as bulldozers and haul trucks, shall be prohibited from idling in excess of 5 minutes, which is consistent with recommended strategies to reduce and/or eliminate diesel idling for warehouse distribution facilities according to the City's *Good Neighbor Guidelines* (2008).

With implementation of mitigation measures NOI-3 and NOI-4, temporary and periodic increase in noise level impacts on sensitive receptors due to construction activities which may result from the project would be **less than significant with mitigation incorporated**.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				\boxtimes
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12e. Response (Source: GP 2025 Figure N-8 Riverside and Flabob Airport Noise Contours, Figure N-9 March ARB Noise Contour, Figure N-10 Noise/Land Use Noise Compatibility Criteria, Noise Study [Rincon Consultants 2017e])

No Impact. The project site is not located within two miles of a public airport. The nearest airport to the project site is Flabob Airport, located 4.5 miles west. March Air Reserve Base/Inland Port Airport is located approximately 7 miles southeast. The project site is within the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan Zone E. Noise impacts to Zone E properties are "Low" with occasional overflights being intrusive to some outdoor activities. The project was reviewed by the Airport Land Use Commission on July 13, 2017 and was found to be consistent with the Airport Land Use Compatibility Plan. Therefore, the project would have **no impact** on aviation-related noise levels. No mitigation is required.

f. For a project within the vicinity of a private airstrip, would the		
project expose people residing or working in the project area to		
excessive noise levels?		

12f. Response (Source: GP 2025 Figure PS-6 Airport Safety Zones and Influence Areas)

No Impact. Per the GP 2025 Program FPEIR, there are no private airstrips within the City that would expose people working or residing in the City to excessive noise levels. Because the project consists of development anticipated under the GP 2025, is not located in proximity of a private airstrip, and does not entail the construction and operation of a private airstrip on the project site, the project would not expose people residing or working in the City to excessive noise levels related to a private airstrip and would have **no impact**. No mitigation is required.

13. POPULATION AND HOUSING		
Would the project:		
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?		

13a. Response (Source: GP 2025 Table LU-3 Land Use Designations, FPEIR Table 5.12-A SCAG Population and Households Forecast, Table 5.12-B General Plan Population and Employment Projections 2025, Table 5.12-C 2025 General Plan and SCAG Comparisons, Table 5.12-D General Plan Housing Projections 2025, Capital Improvement Program and SCAG's Regional Comprehensive Plan and RTP)

Less Than Significant Impact. The current population of Riverside is 326,792 (DOF 2017), but is forecast to increase to 386,600 by 2040 (SCAG 2016). The project consists of constructing a warehouse building in an existing light industrial area. According to an employee density study prepared for SCAG in 2001, warehouse uses in Riverside County employ, on average, 16.32 employees per net-acre. Thus, the project would be expected to employ approximately 273 persons (16.32 employees/acre x 16.7 net acres). According to SCAG, an additional 80,500 employees are anticipated to work in Riverside by 2040 compared to 2012. The 273 employees working at the proposed building would account for 0.3 percent of SCAG's employment growth forecast for Riverside, and be within the range of employment growth anticipated under the GP 2025.

The project is anticipated to draw upon employees from Riverside and not result in substantial population growth in the project area that we Therefore, the project would have a less than significant impact. N	ould require no	ew housing, ro		
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				\boxtimes
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				\boxtimes
13b, c. Response (Source: GP 2025 Table LU-3 Land Population and Households Forecast)	Use Designa	tions, FPE	R Table 5	12-A SCAG
No Impact. The project site is currently vacant, and there are no Implementation of the project would not displace any existing hous nor would it displace a substantial number of people that would transicipated to draw upon employees from Riverside and regional R new jobs that would result in substantial population growth in the 12025 would be sufficient in meeting the nominal potential increase if the project would have no impact on existing housing. No mitigation	ing or require igger the need iverside area. Oroject area. In housing den	the construction of the co	on of replacer tent housing. The project would cousing project	ment housing, The project is d not provide ctions through
14. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?			\boxtimes	
14a. Response (Source: FPEIR Table 5.13-B Fire Statio Ordinance 5948 § 1)	n Locations	, Table 5.13	3-C RFD St	tatistics and
Less Than Significant Impact. The Riverside Fire Department (RF project site. The closest fire station, Station 6 Northside, is located west of the project site. The average on-site response time is five min The RFD's goal is to maintain a five-minute response time for emergency medical services and fire-related incidents.	at 1077 Orang nutes and 30 s	ge Street, locat econds, accord	ed approximated approximated to the GP	tely 2.1 miles 2025 FPEIR.
The project site is located in an urbanized area and consists of cobuilding totaling 339,510 square feet of warehouse and 6,820 square would be constructed pursuant to the 2013 California Fire Code a building would include installation of an automatic fire sprinkler system (Prevention), and would be subject to inspection and approval by the project entails office and warehouse uses and no residential uses, the maximum number of possible individuals. The project also includes along the eastern and southern boundary of the project site. As the to 12-foot clearance for fire service vehicles and will be designed to Therefore, the project would cause an incremental increase in the new by the RFD, though it would not create the need for new or alterestignificant impact on the demand for fire department facilities and second	e feet of assoc s adopted and tem in accord ne City Fire D project site w improvements rail is needed keep the man ed for fire pro-	iated office spamended by ance with City Department privould not be consisted a hiking a for fire protectimum slope stection services. Therefore,	pace. The prop the City of R y ordinance 16 for to occupant ontinuously oc and fire access tion, the trail y no greater that es in an area a the project ha	oosed building Riverside. The 5.32.080 (Fire acy. Since the ccupied by the trail that runs will provide an 15 percent. already served
b. Police protection?			\boxtimes	
14b. Response (Source: GP 2025 Figure PS-8 Neighborhood	Policing Ce	nters)		

Less than Significant Impact. The Riverside Police Department (RPD) provides police protection services to the City and the project site. The two nearest RPD stations are located at 4102 Orange Street and 3775 Fairmount Boulevard, 3.7 miles southwest of the project site. The average response time for priority calls is within seven minutes, and within 12 minutes for

second priority calls, according to the GP 2025 FPEIR.				
The project site is located in an urbanized area, in an area currently seemploy approximately 273 employees and would operate 24 hour holidays. Since the project does not contain any residential uses, the maximum number of possible individuals. The project would cause a services in an area already served by the RPD. However, it would Therefore, the project would have a less than significant impact services. No mitigation is required.	s a day, 7 da project site w n incremental not create the	lys a week, would not be considered in the need for new	vith the except ontinuously oc e need for poly or altered po	tion of some cupied by the ice protection blice services.
c. Schools?				\boxtimes
14c. Response (Source: GP 2025 FPEIR Figure 5.13-2 RUSD 3 AUSD Boundaries, Table 5.13-E AUSD, Table 5.13-G Education Level, and Figure 5.13-4 Other School District Both	Student Ge			•
No Impact. The project site is located in boundaries of the Riverside School, 700 Highlander Drive and University Heights Middle approximately 0.8 mile south. The proposed project does not include population of school age children in the area. Therefore, the project school facilities or services. No mitigation is required.	School (1155 de residential	Massachuse development	tts Avenue), and would no	both located tincrease the
d. Parks?				\boxtimes
14d. Response (Source: GP 2025 Figure PR-1 Parks, Of Recreation Facilities, Parks Master Plan 2003, GP 2025 FF Types, and Table 5.14-C Park and Recreation Facilities Fundamental No Impact. Parks and recreation facilities are addressed in Section 1: include residential development that would permanently increase the on the demand for additional park facilities or services. No mitigation	PEIR Table : led in the River (Recreation) expreparation.	5.14-A Park verside Rena of this IS. Th	and Recreatissance Inition e proposed	tion Facility ative) oject does not
e. Other public facilities?				\square
14e. Response (Source: GP 2025 Figure LU-8 Community For Figure 5.13-6 Community Centers, Table 5.3-F Riverside Continuary Service Standards) No Impact. The Highgrove Library, managed under the Riverside Continuation of the project site. The Ruth Lewis Community Comproposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not supposed project does not include residential development that would be supposed project does not include residential development that would be supposed project does not suppose	mmunity Ce County Library enter is locate ld permanentl	Y System, is lot d 2.6 miles wy increase the	ocated at 530 eyest of the proepopulation a	rside Public Center Street, ject site. The nd would not
substantially increase the demand for other public services in the City public facilities. No mitigation is required.	. Therefore, th	ie project wou	ld have no im	pact on other
15. RECREATION				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				\boxtimes
15a. Response (Source: GP 2025 Figure PR-1 Parks, Of Recreation Facilities, Figure CCM-6 Master Plan of Trails of FPEIR Table 5.14-A Park and Recreation Facility Types, a Funded in the Riverside Renaissance Initiative, Table 5.14-D Chapter 16.60 Local Park Development Fees, Bicycle Master Plan)	and Bikeway nd Table 5. Inventory o	s, Parks Max 14-C Park a f Existing Co	ster Plan 200 nd Recreatio ommunity Ce	03, GP 2025 on Facilities enters, RMC

No Impact. The northwestern portion of Box Springs Mountain Reserve Park, managed by Riverside County Parks, borders the southern portion of the project site. Hunter Park, managed by the City's Parks, Recreation and Community Services Department, is located 0.7 mile west of the project site. The proposed warehouse project does not include residential

development that would permanently increase the population. The City's adopted standard for developed park acreage of 3 acres per 1,000 residents would not be adversely affected with implementation of the proposed building. In accordance with RMC Sections 16.60 and 16.44, a Local Park Development Fee and a Regional Park and Reserve Park Development Fee is imposed on the construction or placement of all nonresidential units.

Site plans indicate the preservation and enhancement of an existing trail connection that starts along Gage Canal at the southwest corner of the project site and runs along the southern and eastern boundary of the site, which is part of the Sugarloaf Trails of the Box Springs Mountain Reserve. The trail would remain publicly accessible for bicycling and hiking. The trail will provide a 12-foot clearance for fire service vehicles and will be designed to keep the maximum slope no greater than 15 percent. Warehouse employees may also access the trail during midday breaks. Therefore, the project would have **no impact** on existing neighborhood and regional parks. No mitigation is required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might		\boxtimes
have an adverse physical effect on the environment?		

15b. Response (Source: Project Description)

No Impact. The project does not include new recreational facilities or require the construction or expansion of recreational facilities. Site plans indicate the preservation and enhancement of an existing trail connection that starts along Gage Canal at the southwest corner of the project site and runs along the southern and eastern boundary of the site, which is part of the Sugarloaf Trails of the Box Springs Mountain Reserve. The trail would remain publicly accessible for bicycling and hiking. The proposed building would be used for office and warehouse operations with no residential dwellings that would permanently increase the population. Therefore, the construction or expansion of recreational facilities in the absence of a population increase is not necessary and the project would have **no impact**. No mitigation is required.

16. TRANSPORTATION/TRAFFIC		
Would the project result in:		
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		
b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?		

16a and 16b. Response (Source: GP 2025 Figure CCM-4 Master Plan of Roadways, FPEIR Figure 5.15-4 Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D Existing and Future Trip Generation Estimates, Table 5.15-H Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15.-K Freeway Analysis Proposed General Plan, Appendix H Circulation Element Traffic Study and Traffic Study Appendix, SCAG's RTP, and Traffic Impact Analysis [Rick Engineering 2017b])

Less Than Significant Impact with Mitigation Incorporated. Rick Engineering prepared a traffic impact analysis (TIA) for the project to assess project traffic impacts. The traffic analysis evaluated potential project-related traffic impacts at 14 key intersections in the vicinity of the project site:

Signalized Intersections:

- Columbia Avenue/Primer Street
- Columbia Avenue/ E. La Cadena Drive
- Columbia Avenue/Chicago Avenue
- Columbia Avenue/Iowa Avenue

Marlborough Avenue/Iowa Avenue

Unsignalized Intersections:

- Interchange Street/W. La Cadena Drive/I-215 SB Ramps
- I-215 NB Ramps/E. La Cadena Drive
- Columbia Avenue/Northgate Street
- Columbia Avenue/ Research Park Drive
- Palmyrita Avenue/Michigan Avenue
- Marlborough Avenue/ Chicago Avenue
- Marlborough Avenue/Atlanta Avenue
- Marlborough Avenue/Rustin Avenue
- Marlborough Avenue/Northgate Street

A Level of Service (LOS) A through D is considered acceptable for roadway segments, according to the City's Roadway Capacity Exhibit D in the City of Riverside's *Traffic Impact Analysis Preparation Guide* (2016c). The TIA determined that all project area intersections currently operate at LOS D or better during the AM and PM peak hours, with the exception of the following:

- Interchange Street/W. La Cadena Drive/I-215 SB Ramps LOS E during PM Peak Hour
- I-215 NB Ramps/E. La Cadena Drive LOS F during AM/PM Peak Hour

Trip generation for the project was estimated using trip generation rates for Manufacturing Facilities (item 140) and General Office (item 710) provided in the Institute of Transportation Engineers *Trip Generation Manual*. The project would generate an estimated total of 1,468 new daily trips with 274 trips during the AM peak hour and 335 trips during the PM peak hour. Because the project would operate 24 hours a day, five days a week, it is anticipated that many project-generated trips would occur outside of peak traffic periods. The City requires mitigation if project traffic would deteriorate roadway LOS to below target LOS E.

To estimate the opening year (2018) ambient/background traffic volumes, the existing traffic volumes were increased by two percent from 2017 measurements. This growth rate was provided by the City of Riverside, consistent with anticipated buildout under the GP 2025. The 2018 expected traffic volumes are therefore used as a baseline from which to compare project traffic impacts. The TIA determined that the addition of project-related trips to existing + ambient traffic levels would have no new impact on study intersections. Table 22 details Existing + Ambient + Project traffic volumes and impacts.

Table 22 Existing + Ambient + Project Traffic Volumes

Intersection	Delay	LOS	Significant Impact	With Mitigation Delay/LOS
Columbia Avenue/Primer Street				
AM Peak	18.5	В		
PM Peak	21.6	C		
Interchange Street/W. La Cadena Drive/I-215 SB				
AM Peak	23.2	C		
PM Peak	67.5	F	YES	46.0/D
I-215 NB Ramps/E. La Cadena Drive				
AM Peak	153.4	F	YES	7.4/A
PM Peak	743.8	F	YES	7.3/A
Columbia Avenue/ E. La Cadena Drive				
AM Peak	33.1	C		
PM Peak	29.8	C		
Columbia Avenue/Chicago Avenue				
AM Peak	28.1	C		
PM Peak	29.9	C		
Columbia Avenue/Iowa Avenue				
AM Peak	41.8	D		
PM Peak	45.5	D		
Columbia Avenue/Northgate Street				

AM Peak	13.9	В		
PM Peak	13.6	В		
AM Peak	11.1	В		
PM Peak	19.9	C		
AM Peak	10.5	В		
PM Peak	17.1	C		
AM Peak	26.1	D		
PM Peak	31.6	D		
AM Peak	10.4	В		
PM Peak	10.9	В		
AM Peak	27.9	С		
PM Peak	37.1	D		
AM Peak	20.1	С		
PM Peak	25.0	С		
AM Peak	11.4	В		
PM Peak	12.2	В		
	PM Peak AM Peak PM Peak	PM Peak 13.6 AM Peak 11.1 PM Peak 19.9 AM Peak 10.5 PM Peak 17.1 AM Peak 26.1 PM Peak 31.6 AM Peak 10.4 PM Peak 10.9 AM Peak 27.9 PM Peak 37.1 AM Peak 25.0 AM Peak 25.0 AM Peak 11.4	PM Peak 13.6 B AM Peak 11.1 B PM Peak 19.9 C AM Peak 10.5 B PM Peak 17.1 C AM Peak 26.1 D PM Peak 31.6 D AM Peak 10.4 B PM Peak 10.9 B AM Peak 27.9 C PM Peak 37.1 D AM Peak 27.9 C PM Peak 25.0 C AM Peak 11.4 B	PM Peak 13.6 B AM Peak 11.1 B PM Peak 19.9 C AM Peak 10.5 B PM Peak 17.1 C AM Peak 26.1 D PM Peak 31.6 D AM Peak 10.4 B PM Peak 10.9 B AM Peak 27.9 C PM Peak 37.1 D AM Peak 20.1 C PM Peak 25.0 C AM Peak 11.4 B

Source: Adapted from Rick Engineering Company 2017b. Notes: Delay is measured in seconds; LOS = Level of Service

The TIA presented a list of cumulative projects within 1.5 miles of the project in order to determine cumulative impacts from anticipated existing + ambient (year when the project is to be operational) + cumulative + project traffic volumes. Table 23 detailed the anticipated traffic volumes.

Table 22 Existing + Ambient + Cumulative + Project Traffic Volumes

Intersection	Delay	LOS	Significant	With Mitigation
intersection	Delay	Los	Impact	Delay/LOS
Columbia Avenue/Primer Street				
AM Peak	19.2	В		
PM Peak	21.8	C		
Interchange Street/W. La Cadena Drive/I-215 SB				
AM Peak	26.7	D		
PM Peak	74.5	F	YES	48.5/D
I-215 NB Ramps/E. La Cadena Drive				
AM Peak	170.8	F	YES	7.4/A
PM Peak	895.0	F	YES	7.5/A
Columbia Avenue/ E. La Cadena Drive				
AM Peak	34.3	C		
PM Peak	31.4	C		
Columbia Avenue/Chicago Avenue				
AM Peak	28.6	C		
PM Peak	30.3	C		
Columbia Avenue/Iowa Avenue				
AM Peak	50.7	D		
PM Peak	49.1	D		
Columbia Avenue/Northgate Street				
AM Peal	14.4	В		
PM Peak	14.0	В		

Columbia Avenue/ Research Park drive				
	AM Peak	11.1	В	
	PM Peak	20.0	C	
Palmyrita Avenue/Michigan Avenue				
	AM Peak	10.6	В	
	PM Peak	17.2	C	
Marlborough Avenue/ Chicago Avenue				
	AM Peak	26.2	D	
	PM Peak	25.5	D	
Marlborough Avenue/Atlanta Avenue				
	AM Peak	10.5	В	
	PM Peak	11.0	В	
Marlborough Avenue/Iowa Avenue				
	AM Peak	35.2	D	
	PM Peak	42.4	D	
Marlborough Avenue/Rustin Avenue				
	AM Peak	26.3	D	
	PM Peak	28.1	D	
Marlborough Avenue/Northgate Street				
-	AM Peak	11.7	В	
	PM Peak	12.3	В	

Source: Adapted from Rick Engineering Company 2017b. Notes: Delay is measured in seconds; LOS = Level of Service

As shown, the intersections of Interchange Street/W La Cadena Drive/I-215 SB Ramps and 215 NB Ramps/E. La Cadena Drive are currently operating below acceptable levels of service and are anticipated to remain at unacceptable levels with the addition of project traffic. For the intersections to operate at an LOS D or better under project operation, the intersections would need to be signalized. Therefore the following mitigation measures will be required:

MM T-1: Fair Share Contributions. Prior to the issuance of occupancy permits, the project proponent shall make a fair-share contribution towards the improvement of the intersections of Interchange Street/W La Cadena Drive/I-215 SB Ramps and 215 NB Ramps/E. La Cadena Drive, calculated to be 7 percent.

With the implementation of mitigation measure T-1, the project would have a **less than significant impact with mitigation incorporated**.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				\boxtimes
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16c. Response (Source: GP 2025 Figure PS-6 Airport Safety Zones and Influence Areas, RCALUCP)

No Impact. The project site is not located within two miles of a public airport. The nearest airport to the project site is Flabob Airport, located 4.5 miles west. March Air Reserve Base/Inland Port Airport is located approximately 7 miles southeast. The project site is within the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan Zone E. Risk levels to Zone E properties are "Low" as the land falls within outer or occasionally used portions of the flight corridors. The project was reviewed by the Airport Land Use Commission on July 13, 2017 and was found to be consistent with the Airport Land Use Compatibility Plan. This project would have no effects on demand for local air service or volumes of air traffic. Therefore, the project would not alter air traffic patterns, and would have **no impact**. No mitigation is required.

d. Substantially increase hazards due to a design feature (e.g.,	 	
sharp curves or dangerous intersections) or incompatible uses		
(e.g., farm equipment)?		

16d. Response: (Source: Project Site Plans, TIA [Rick Engineering 2017b])

Less Than Significant Impact with Mitigation Incorporated. The proposed building would be accessible through driveways via Marlborough Avenue and Research Park Drive. The project building would comply with California Building Code standards and would not include any design features that would increase circulation hazards. Operation of an office and warehouse facility would not result in roadway uses that would be incompatible with the existing land uses surrounding

the area. The project would not result in any changes to the lane or street configuration of Research Park Drive. The project would extend the eastern terminus of Marlborough Avenue to include a cul-de-sac and two driveways to the project site. These changes would not affect the overall configuration or accessibility of Marlborough Avenue, however, the extension of Marlborough Avenue across the Gage Canal would result in a break in the use of the Canal as a bikeway and pedestrian path. This design change will require people using the Canal path to stop at the roadway and walk around the cul-de-sac using the proposed sidewalk improvements. The placement of the egress/ingress driveways along the eastern curve of the cul-de-sac could create result in a potential hazard to pedestrians and bicyclist using this route due to truck leaving the project site. In addition, the public may be tempted to simply cross at the roadway to connect to the other end of the pathway, which would result in the crossing of the public street where no crosswalk would be present. Therefore, the following mitigation measures shall be required:

MM T-2: Route Signage. Prior to occupancy, the applicant shall install signage on each side of the cul-desac where the Gage Canal meets the road extension in order to notify the pedestrians and bicyclists of the break in the Gage Canal pathway. The signage shall direct the public to utilize the sidewalk to reconnect to the remainder of the pathway.

MM T-3: Stop Signs Install at Egress Points along Marlborough. Prior to occupancy, the applicant shall install additional stop signs to be placed at the egress points of the Marlborough Avenue driveways from the project located outside of public right-of-way.

The implementation of mitigation measures T-2 and T-3 will help ensure the safety of pedestrians and cyclists using the Gage Canal pathway. This direction signage would encourage people to use the sidewalk improvements rather than cross the street where there would be no crosswalk. The stop signs would require trucks to navigate the steep driveway slower in order to come to a complete stop, which will help drivers be aware of pedestrian and bicycle traffic on Marlborough Avenue. Therefore, the project would have a **less than significant impact with mitigation incorporated.**

e. Result in inadequate emergency access?					
16e. Response (Source: Caltrans Highway Design Manual, RMC, and 2016 California Fire Code)					
Less Than Significant Impact. The proposed building would be accessible via a 119-foot driveway on Marlborough Avenue and a 70-foot driveway on Research Park Drive. Project site plans indicate a 40-foot wide driveway on site, along the perimeter of the building and through the parking areas, which exceeds the City's 12-foot minimum for fire apparatus access roads according to RMC Section 16.32.290. RMC Section 18.210.030(F) states that the minimum turn area radius for fire access is 36 feet, provided at the end of cul-de-sacs and dead-end streets. ROW improvements would be made to the eastern terminus of Marlborough include the primary driveway access to the project site, which would be 119 feet wide. Internal roadways within the project site vary from 40 feet in width along the west and north sides of the building, 35 feet along the east side of the building with single-rows of parking on both sides of the roadway, and 62 feet along the south side of the building. Therefore, project site plans indicate adequate turn area radii and roadway access for fire apparatus. The project would have a less than significant impact on emergency access. No mitigation is required.					
f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities)?					

16f. Response (Source: GP 2025 FPEIR, GP 2025 Land Use and Urban Design Element, Circulation and Community Mobility and Education Elements, City of Riverside Bicycle Master Plan)

Less Than Significant Impact. The project site and surrounding area are served by pedestrian and bicycle facilities. There are Riverside Transit Agency public transit stops along Iowa Avenue, approximately 3,000 feet west of the project site. Class II bicycle lanes and sidewalks exist on both sides of Marlborough Avenue, though the sidewalk on the south side of the street ends at Northgate Street. The project would not result in any changes to the lane or street configuration of Research Park Drive. The project would extend the eastern terminus of Marlborough Avenue to include a cul-de-sac and driveway to the project site. These changes would not affect the overall configuration or accessibility of Marlborough Avenue, nor impact the performance or safety of alternative transportation modes. Therefore, the project would have a less than significant impact on adopted policies, plans, or programs supporting alternative transportation. No mitigation is required.

17. TRIBAL CULTURAL RESOURCES		
Would the project:		
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code section		

21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:		
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?		

17.a.i. Response (Source: GP 2025 and GP 2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5.-2 Prehistoric Cultural Resources Sensitivity, Cultural Resources Survey [Rincon Consultants 2017a])

Less Than Significant with Mitigation Incorporated. The project site is located in a developed area, adjacent to office and light industrial uses. The project site was previously disturbed, and no documented cultural or tribal resources within the project site were identified in the archival records search and pedestrian survey of the project site conducted as part of Rincon Consultants' site assessment. Chapter 532, Statutes of 2014 (i.e., Assembly Bill [AB] 52), requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource." Per AB 52, Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects.

The City commenced tribal notification in accordance with AB 52 on July 11, 2017. The 30-day notification response window closed on August 10, 2017. The Pechanga Tribe of Luiseño Indians and the San Manuel Band of Mission Indians each commented on the proposed project and the Cultural Resources study prepared for the project, but did not initially indicate the presence of tribal cultural resources within or adjacent to the project site. However, during the site visit conducted as part of the tribal consultation process, a potential tribal artifact was identified near the southeast portion of the project site, by the existing trail. Therefore, mitigation measures CR-1 through CR-6 shall be implemented during ground-disturbing activities associated with construction and trail improvements at 750 Marlborough Avenue to ensure potential impacts to archaeological and tribal resources are **less than significant with mitigation incorporated**.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significant of the resource to a California Native American tribe.				
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17.a.ii. Response (Source: Cultural Resources Survey [Rincon Consultants 2017a])

Less Than Significant with Mitigation Incorporated. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) is listed in or determined eligible for listing in, the California Register of Historical Resources (CRHR); (2) is listed in a local register of historical resources as defined in PRC Section 5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) is determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5[a]).

Rincon Consultants prepared a Cultural Resource Survey for the project, which included an archival records search and pedestrian survey of the project site. There were no previously recorded cultural resources within the project site, based on the archival records search. A pedestrian survey of the project area resulted in the identification of previously unrecorded remnants of a historical-period irrigation system. The system is no longer in use and has been damaged and vandalized, and it was determined that the irrigation system cannot be demonstrated to be associated with events or persons significant in our past. The system does not embody the distinctive characteristics of a type, period, or method of installation nor would it yield information important to history. The irrigation system has been recorded on Department of Parks and Recreation Series 523 forms, and has been recommended ineligible for listing in the CRHR.

No documented tribal resources within the project site were identified in the archival records search and pedestrian survey of the project site conducted as part of Rincon Consultants' site assessment. However, during the site visit conducted as part of the tribal consultation process, a potential tribal artifact was identified near the southeast portion of the project site, by the

existing trail. Therefore, mitigation measures CR-1 through CR-6 shall be implemented during ground-disturbing activities associated with construction and trail improvements at 750 Marlborough Avenue to ensure potential impacts to archaeological and tribal resources are **less than significant with mitigation incorporated**.

18. UTILITIES AND SYSTEM SERVICES					
Would the project:					
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?					
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?					
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			\boxtimes		
18a, b, e. Response (Source: GP 2025 Figure PF-2 Sewer Facilities Map, GP 2025 FPEIR Figure 5.16-5 Sewer Service Areas, City of Riverside Public Utilities Department 2015 Urban Water Management Plan)					

Less Than Significant Impact. According to FPEIR Figure 5.16-5, the City of Riverside Public Works (PW) Department provides sewer service to the project site. The City of Riverside PW Department collects, treats, and disposes wastewater at the project site through the Riverside Regional Water Quality Control Plant (RRWQCP), and complies with state and federal requirements governing the treatment and discharge of wastewater. The wastewater collection system has over 776 miles of gravity sewers that range in size from six to 54 inches in diameter and includes 18 wastewater pump stations. In 2015, RRWQCP's plant capacity was expanded to 46 million gallons per day (mgd) (Riverside, City of 2016b). The RRWQCP serves approximately 295,000 people, who generate approximately 18 mgd.

Wastewater flows associated with the proposed office and warehouse building would consist of substances typically generated by office use, as no industrial production activities would occur on site. The project is anticipated to employ 273 people, who would generate approximately 0.017 mgd of wastewater per day, or less than one percent of total daily wastewater generation for the City of Riverside PW Department's service area². Since the RRWQCP is currently at only 40 percent capacity, the project would not require the construction of new or expanded wastewater facilities. Furthermore, sewer connection fees would be determined per RMC Section 14.08.080. Therefore, the project would have a **less than significant impact** related to wastewater treatment. No mitigation is required.

c. Require or result in the construction of new storm water		
drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		

18c. Response (Source: GP 2025 FPEIR Figure 5.16-2 Drainage Facilities)

Less Than Significant Impact. Implementation of the project would increase the amount of impervious surface areas at the project site. Project site plans include a proposed catch basin inlet at the improved cul-de-sac at Marlborough Avenue. The catch basin would connect to the existing 36 inch storm drain on Marlborough Avenue to maintain the overall drainage pattern. A series of bioretention facilities are proposed to capture sheet flow around the paved parking areas on site, before conveying water to the existing storm drain on Marlborough Avenue. RMC Section 18.240.020 requires drainage fees to be paid to the City for new construction, which are then transferred into a drainage facilities fund maintained by the Riverside County Flood Control and Water Conservation District and compliant with California Government Code Section 66483.

Furthermore, GP 2025 Policies PF 4.1 and PF 4.3 require the City to continue to routinely monitor its storm drain system and to fund and improve those systems as identified in the City's Capital Improvement plan. Implementation of these policies would ensure that the City is adequately served by drainage systems. Therefore, the project would have a **less than significant impact** on existing storm water drainage facilities that would not require the expansion of existing facilities. No

² Project wastewater generation as a percentage of total daily wastewater generation: (18 mgd / 295,000 people) * 273 employees = 16,543 gallons/day; (16,543 gallons/day) / 18 mgd = $0.000925 \approx 0.093$ %

mitigation is required.				
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				
18d. Response (Source: GP 2025 FPEIR Figure 5.16-3 Wat City of Riverside Public Utilities Department 2015 Urban Wa		_	5.16-4 Wate	r Facilities,
Less Than Significant Impact. The project site is served by Rivers feet (24,415 million gallons) of water to 295,000 people within its sthe project would use approximately 80 million gallons of water Management Plan plans on supplying 124,703 acre feet (40,634 demand under anticipated buildout from GP 2025. Annual estimate total water supplied by RPU in 2015, and 0.2 percent of total water adequate water supply to serve the project from existing entitlement impact. No mitigation is required.	ervice area in per year. The nillion gallon d project water projected to	2015. Accorde RPU Departs) of water ber use would a be supplied in	ling to CalEEI tment's 2015 y 2040 to me account for the 2040. Theref	Mod analysis, Urban Water eet increasing ree percent of ore, RPU has
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				
g. Comply with federal, state, and local statutes and regulations related to solid waste?				
18f, g. Response (Source: GP 2025 FPEIR Table 5.16-A Existing Landfills and Table 5.16-M Estimated Future Solid Waste Generation from the Planning Area)				
Less Than Significant Impact. The City of Riverside PW Dephouseholds and the remainder is collected by private contractors. A City must divert at least 50 percent of the waste generated from land from landfills and that the City should achieve 100 percent recyclevelopment. In 2015, the per employee disposal rate was 14.3 per pounds per day (CalRecycle 2017c).	ccording to Police of the Cording Citywide	ublic Resource cy PF-5.1 stat for both resi	es Code Sections es waste should dential and n	on 41780, the ld be diverted on-residential
The majority of Riverside waste in 2016 went to the Badlands Sanita (36,326 tons; CalRecycle 2017d). The Badlands Sanitary Landfill, lo of 4,800 tons, a permitted total capacity of 34,400,000 cubic yards, a landfill is projected to close in 2022 (CalRecycle 2017a). The El Sob capacity of 16,054 tons, a permitted total capacity of 184,930,000 to projected to close in 2045 (CalRecycle 2017b).	ocated in More nd a remaining orante Landfill	eno Valley, ha g capacity of 1 l, located in Co	s a permitted of 5,748,799 cuborona, has a po	daily capacity oic yards. The ermitted daily
According to CalEEMod analysis, the proposed office and warehouse uses would generate an estimated 326 tons of solid waste per year, which equates to approximately 0.9 tons of waste per day. The amount of solid waste generated by the project would be negligible, and both the Badlands Sanitary Landfill and the El Sobrante Landfill have adequate capacity to accommodate project-generated waste. Therefore, the project would have a less than significant impact . No mitigation is required.				
19. MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
19a. Response (Source: GP 2025 Figure OS-6 SKR-HCP, F	igure OS-7	MSHCP Cor	es and Linka	iges. Figure

19a. Response (Source: GP 2025 Figure OS-6 SKR-HCP, Figure OS-7 MSHCP Cores and Linkages, Figure OS-8 MSHCP Cell Areas, GP 2025 FPEIR Figure 5.4-2 MSHCP Area Plans, Figure 5.4-4 MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 MSHCP Criteria Area Species Survey Area, Figure 5.4-8 MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools, and Burrowing Owl Focused Surveys [Rincon Consultants 2017d] and Habitat Assessment [Rincon Consultants 2017b], GP

2025 FPEIR Figure 5.5-1 Archaeological Sensitivity and Figure 5.5-2 Prehistoric Cultural Resources Sensitivity, GP 2025 Policy HP-1.3,GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the RMC, Cultural Resources Survey [Rincon Consultants 2017a])

Less Than Significant with Mitigation Incorporated. Potential impacts related to habitat of fish or wildlife species were discussed in the Biological Resources Section of this IS. Mitigation measure BIO-1 would be implemented prior to ground-disturbing activities associated with construction activities at 750 Marlborough Avenue to ensure potential impacts to biological resources are less than significant with mitigation incorporated. Additionally, potential impacts to cultural, archaeological and paleontological resources related to major periods of California and the City of Riverside's history or prehistory were discussed in the Cultural Resources Section of this IS. Mitigation measures CR-1, CR-2 and CR-3 would be implemented during ground-disturbing activities associated with construction activities at 750 Marlborough Avenue to ensure potential impacts to cultural resources are less than significant with mitigation incorporated.

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19b. Response (Source: FPEIR Section 6 Long-Term Effects/ Cumulative Impacts for the GP 2025 Program)

Less Than Significant Impact With Mitigation Incorporated. The proposed project involves construction of a 346,330 square foot industrial building comprised of approximately 339,510 square feet of unrefrigerated warehouse space and 6,820 square feet of office space, on an approximately 22.34 gross-acre site. No new land uses or changes to the existing land use designations are proposed, and the project would be consistent with the City's General Plan 2025. Implementation of the project would result in less than significant environmental impacts with implementation of the identified mitigation measures. Cumulative impact analyses are specifically included for certain issue areas such as air quality, greenhouse gas emissions, noise and traffic. Impacts would be less than significant with incorporation of identified mitigation measures N-1 through N-4. Other impacts associated with the project would generally be localized at the project site and would not combine with other projects to cause cumulatively considerable environmental impacts. With mitigation as identified in this Initial Study, the project would not result in impacts that are individually limited, but cumulatively considerable. Therefore, cumulative impacts would be less than significant with mitigation incorporated.

c. Does the project have environmental effects which will cause		\square	
substantial adverse effects on human beings, either directly or			
indirectly?			

19c. Response (Source: FPEIR Section 5 Environmental Impact Analysis for the GP 2025 Program)

Less Than Significant. The proposed project would include a warehouse building with associated office space and will largely affect disturbed/developed lands within the City of Riverside. Potential effects of the project on human beings (e.g. air quality, noise, population and housing, hazards and hazardous materials, and traffic) have been evaluated herein within this Initial Study. Impacts resulting with the project have been found to be less than significant or it has been determined that impacts could be reduced to less than significant with mitigation measures incorporated. Therefore, based on the above analysis and the conclusions identified in this Initial Study, the project would not cause substantial adverse effects, directly or indirectly, to human beings. Therefore, potential direct and indirect impacts on human beings resulting from the proposed project would be less than significant. No mitigation is required.

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Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
Aesthetic Resources	MM AES-1: Photometric Plan. Prior to the issuance of building permits, the applicant shall submit a photometric (lighting) plan for approval by the Community & Economic Development Department, Planning Division. The approved light design requirements shall be included on the final building plan sheets. The lighting plan shall incorporate the following requirements: The project shall be designed in such a manner as to prevent light spillage from the project to the adjacent and nearby open space areas Project lighting shall not exceed an intensity of one foot-candle Shielding shall be employed, where feasible Any night lighting shall be directed away from natural open space areas and directed downward and towards the center of the development No project lights shall blink, flash, oscillate, or be of unusually high intensity or brightness Energy-efficient LPS or HPS lamps shall be used exclusively throughout the project site to dampen glare Exterior lights shall be only "warm" LED lights (<3000K color temperature)	Prior to the issuance of building permits	Community & Economic Development Department, Planning and Building & Safety Divisions	Approval of Plans
Biological Resources	MM BIO-1: Burrowing Owl Pre-Construction Survey. A preconstruction survey shall be conducted by a qualified biologist within 30 days prior to initiating ground disturbing activities per Objective 6 of the MSHCP BUOW Species Account. If owls are not present on the project site during the pre-construction survey, the proposed disturbance activities may proceed. In the event that owls are discovered and may be affected by the proposed project, avoidance measure shall be developed in compliance with the MSHCP and in coordination with the CDFW and/or Western	Within 30 days prior to initiating vegetation removal and/or ground disturbing activities	Community & Economic Development Department, Planning and Building & Safety Divisions California Department of Fish and Wildlife if relocation of owls is	Preconstruction Survey Report submitted to the City

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
	Riverside County Regional Conservation Authority.		required.	
Biological Resources	MM BIO-2: Nesting Bird Survey. A pre-construction survey shall be conducted by a qualified biologist within 30 days prior to initiating vegetation removal and/or ground disturbing activities. Vegetation removal and initial ground disturbance should occur outside the nesting bird breeding season between the months of February through August. If project activities occur during the nesting season, which can vary based on annual climatic conditions, geographic location, and avian species requirements; or if potential nesting activity is observed by qualified project personnel, then a nesting bird survey should be conducted by a qualified biologist within one (1) week of proposed construction activities. If active nests of protected native species are located, construction work should be delayed until after the nesting season or until the young are no longer dependent upon the nest site. Construction in the vicinity of an active nest should be conducted at the discretion of a biological monitor	Within 30 days prior to initiating vegetation removal and/or ground disturbing activities	Community & Economic Development Department, Planning and Building & Safety Divisions	Preconstruction Survey Report submitted to the City
Cultural Resources	MM CR-1: Plan Review. Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City and interested tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the Applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised.	Prior to issuance of grading permits, if there are any changes to project site design and/or proposed grades	Community & Economic Development Department, Planning and Historic Preservation Divisions Applicant	Consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation

Impact	Mitigation Measures	Implementation	Responsible	Monitoring/
Category		Timing	Monitoring Party	Reporting Method
Cultural Resources	MM CR-2: Archaeological and Paleontological Monitoring. At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project Applicant shall retain a Secretary of Interior Standards qualified Archaeological Monitor and Native American Tribal Monitor(s) from the consulting tribes to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. 1. The Project Archaeologist, in consultation with interested tribes, the Developer and the City, shall develop an Archaeological Monitoring Plan to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the Plan shall include: a. Project grading and development scheduling; b. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation and ground disturbing activities on the site: including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists; c. The protocols and stipulations that the Applicant, tribes and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation; d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM CR-3.	30 days prior to issuance of grading permit.	Community & Economic Development Department, Planning and Historic Preservation Divisions Qualified Archeological Monitor Native American Tribal Monitor	Archeological Monitoring Plan Evidence that a qualified archeological monitor has been retained shall be provided to the City Evidence that a Native American Tribal monitor has been retained shall be provided to the City

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
	2. In the case of inadvertent discoveries, the consulting Native American tribes or bands will be contacted and provided information of the find, and permitted/invited to perform a site visit when the Project Archaeologist and Tribal monitor makes his/her assessment, so as to provide input. In the case of inadvertent discoveries, the consulting Native American tribes or bands have the right to elect to monitor the project moving forward, should the consulting Native American tribes or bands choose to do so after assessment of the find(s).			
	3. During the project duration, the consulting Native American tribes or bands will be provided copies of any daily/weekly/etc. logs completed by the archaeologist(s) and tribal monitor(s) for review. In addition, the consulting Native American tribes or bands will be provided a copy of the final monitoring report(s) for review.			
Cultural Resources	MM CR-3: Cultural Sensitivity Training. The Project Archaeologist and Native American Monitors from consulting tribes shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	During pre-grading meeting	Community & Economic Development Department, Planning and Historic Preservation Divisions Qualified Archeological Monitor Native American Tribal Monitor	Phase IV Monitoring Report
Cultural Resources	MM CR-4: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this Project. The following procedures will be carried out for treatment and disposition of the discoveries: 1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at	On-going through ground disturbance	Community & Economic Development Department, Planning and Historic Preservation Divisions Project Applicant	Report prepared that documents the finding and disposition of any Native American cultural resources If resources are found and curated, a copy of the curation agreement shall be provided to the City Completed Phase IV Monitoring

the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and 2. Treatment and Final Disposition: The landowner(s)	mpact Sategory	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and	ategory	the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversite of the process; and 2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same: a. Accommodate the process for onsite reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed; b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation; c. If more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan	Timing	Landowner Qualified Archeological Monitor Native American	

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
	d. At the completion of grading, excavation and ground disturbing activities on the site a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project Archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center and interested tribes.			
Cultural Resources	MM CR-5: Human Remains. Cease ground-disturbing activities and notify County Coroner if human remains are encountered. If human remains are unearthed during implementation of the Proposed Project, the City of Riverside and the Applicant shall comply with State Health and Safety Code Section 7050.5. The City of Riverside and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to provide recommendations to the landowner. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to	Grading and construction activities	Community & Economic Development Department, Planning, Historic Preservation, and Building & Safety Divisions Project Applicant	Notify the County Coroner

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
	the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.			
Cultural Resources	MM CR-6: Native American Cultural Resources. Prior to any grading, the Project Applicant will meet with the Project Archeologist, and the consulting Native American tribes or bands in order to assess the feature, identified during consultation, located on the southeast border of the project boundary to determine the suitability for relocation to a permanent open space area. The consulting Native American tribes or bands shall work with the Project Archaeologist, Project Applicant and the Grading Contractor or appropriate personnel to determine whether the features can be relocated safely and will discuss the most appropriate methods for relocation. Before construction activities may resume in the affected area, any visible artifacts shall be recovered and the features recorded using professional archaeological methods. The current Department of Parks and Recreation (DPR) Forms shall be updated, detailing which features were relocated, the process taken and updated maps provided documentation of the features' new location. The site record should clearly indicate that the features are not in their original location and why they were relocated.	Prior to Grading Activity	Project Applicant Qualified Archeological Monitor Native American Tribal Monitor	Provide an updated DPR Form to the Planning Division detailing the relocation of features
Noise	MM NOI-1: Restricted Loading Dock Use. Prohibit the use of the south-facing loading docks between the hours of 10 PM and 7 AM.	On-going	Community & Economic Development Department, Planning Division Project Applicant Building Operator	Evidence of language in lease agreement(s) prohibiting trucks from using the south-facing loading docks between the hours of 10 p.m. and 7 a.m. shall be provided to the Community & Economic Development Department, Planning Division prior to issuance of a certificate of occupancy

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
Noise	MM NOI-2: Rooftop Mechanical Equipment Shielding. A noise-attenuating barrier shall be installed around any new rooftop mechanical equipment to reduce operational noise at Box Springs Mountain Reserve Park to equal to or less than pre-project ambient noise of 49.4 dBA.	Prior to issuance of Building Permits	Community & Economic Development Department, Planning and Building & Safety Divisions	Approval of Plans
Noise	MM NOI-3: Construction Management Plan. Prior to the issuance of grading permits, the applicant shall submit a Construction Management Plan satisfactory to the City of Riverside. The Building Official, or appropriately assigned City staff member, shall be responsible for enforcing noise attenuating construction requirements. The Construction Management Plan shall include, but not be limited to, the following: Excavation, grading, and other construction activities. These activities shall be restricted to the hours allowed under RMC Section 7.35.010. Any deviations from these standards shall comply with the provisions in Title 7 (Noise Control). Staging Area. Provide staging areas on-site to minimize off-site transportation of heavy construction equipment. These areas shall be located to maximize the distance between activity and sensitive receptors. This should reduce noise levels associated with most types of idling construction equipment. Avoid Operating Equipment Simultaneously. Whenever possible, ensure that construction activities are scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels. Inspections. The contractor shall inspect construction equipment to ensure that such equipment is in proper operating condition and fitted with standard factory silencing features. Construction equipment shall utilize all standard factory silencing features, such as equipment mufflers, enclosures, and barriers.	Prior to issuance of Grading Permits	Community & Economic Development Department, Building & Safety Division Public Works Department	Approved Construction Management Plan
Noise	MM NOI-4: Construction Noise Reduction. The following measures shall be followed during construction of the proposed project and associated site improvements:	On-going through Construction Activities	Community & Economic Development Department, Building	Building Inspection Reports

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring/ Reporting Method
	Newest Power Construction Equipment. The newest available power construction equipment with standard recommended noise shielding and muffling devices shall be used.		& Safety Division	
	Mufflers. During project grading and construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. Use of manufacturer-certified mufflers associated with construction equipment has been shown to reduce noise levels by 8 to 10 dBA.			
	Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms should be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving the reverse direction.			
	<i>Idling</i> . All construction vehicles, such as bulldozers and haul trucks, shall be prohibited from idling in excess of five minutes, consistent with the City's <i>Good Neighbor Guidelines</i> .			
Traffic	MM T-1: Fair Share Contributions. Prior to the issuance of occupancy permits, the project proponent shall make a fair-share contribution towards the improvement of the intersections of Interchange Street/W La Cadena Drive/I-215 SB Ramps and 215 NB Ramps/E. La Cadena Drive, calculated to be 7 percent.	Prior to Occupancy	Public Works Department	Certificate of Occupancy
Traffic	MM T-2: Route Signage. Prior to occupancy, the applicant shall install signage on each side of the cul-de-sac where the Gage Canal meets the road extension in order to notify the pedestrians and bicyclists of the break in the Gage Canal pathway. The signage shall direct the public to utilize the sidewalk to reconnect to the remainder of the pathway.	Prior to Occupancy	Public Works Department	Certificate of Occupancy
Traffic	MM T-3: Stop Signs Install at Egress Points along Marlborough. Prior to occupancy, the applicant shall install additional stop signs to be placed at the egress points of the Marlborough	Prior to Occupancy	Public Works Department	Certificate of Occupancy

Impact	Mitigation Measures	Implementation	Responsible	Monitoring/
Category		Timing	Monitoring Party	Reporting Method
	Avenue driveways from the project located outside of public right-of-way.			